



Privacy Policy and Procedures

Category	Privacy
Responsibility of:	– CEO – Data Officer – Project Managers – Project Leads
Staff with operational responsibility for development, implementation, and review	– Data Officer – Data Controllers – Data Processors
Target Audience	All Staff
Associated Policies	– Information Governance and Security Policy – Data Protection Policy – Lamplight Project Implementation Policy – Lamplight Database Support Policy – Bring Your Own Device Policy – Transcription and Voice-to-Text Software Policy – Social Media Policy – SharePoint Cloud Usage Policy
Accessibility	If you would like this policy in larger print or a simplified version contact: media@ctmmind.org.uk
Date 1st Ratified	June 2023
Review Dates	
Policy Review	The Privacy Policy will be reviewed annually, minor changes can be implemented following learning from any organisational change, or technology update, but wider changes must be signed off by the CTM Mind Trustee Board

Contents

Policy Introduction	2
Information We Collect About You	2
How We Use Your Information	2
Sharing of Information	3
Legal Basis for Processing your Data: Compliance with General Data Protection Regulations (GDPR)	3
How We Store Your Personal Information	4
Lamplight CMS	4
SharePoint Online	4
Just Giving	4
Disposal	5
Security	5
Right to Access	5
Right To Request Rectification and Erasure	5
Our Website	6
Securing Your Connection To Our Website	6
Cookies	6
How Visitors Use This Website	6
Contacting Us Via The Website	7
Contact Us	7
Right To Lodge a Complaint	8

Introduction

At Cwm Taf Morgannwg Mind, we prioritise the well-being and privacy of all individuals seeking support, our donors, suppliers, staff, and volunteers. We understand the importance of safeguarding and responsibly using any personal information shared with us.

This privacy policy aims to provide comprehensive information about the collection, processing of your data, along with the security measures employed to protect it.

In accordance with the Data Protection Act 2018 and the UK General Data Protection Guidelines (GDPR), we will collect, store, and utilise the information you provide. We are committed to maintaining the accuracy and currency of this data, ensuring that it is not retained for longer than necessary. While certain legal requirements may dictate the duration of data retention in specific cases, CTM Mind will exercise discretion to ensure that records are not held longer than required.

Information We Collect About You

We collect certain types of information to ensure we can provide the best possible support and services. The information we collect may include:

- Personal identification details, such as your name, address, and contact information.
- Demographic information, such as your age, gender, and ethnicity, to help us better understand the needs of our service users.
- Relevant medical and mental health history, which you may choose to share with us, to ensure we offer appropriate and tailored support.
- Information related to your interactions with us, such as emails, phone calls, or attendance at events or activities.

Please note that this is not an exhaustive list, but it gives you an overview of the types of information we may collect. We treat all the information we collect with utmost confidentiality and in accordance with applicable data protection laws.

If you require more specific details about our data collection practices, please feel free to contact us using the information provided at the end of this privacy policy.

How We Use Your Information

We will use the information you provide us with to carry out our work, which will include, amongst others, the following purposes:

- to plan and deliver services
- to create an appropriate person-centered support plan in line with your needs
- to liaise effectively with other services for your benefit

- to help protect you or others from abuse or harm
- to help you arrange and receive services when needed
- so that external regulators, inspectors and funders can check and audit our services and ensure they meet the required standards
- so that we may review, audit and improve the quality of our services and increase their benefit to you and others
- so that we can ensure our services are accessible to all parts of society
- carrying out our responsibilities to staff and volunteers
- contacting professionals at other agencies regarding referrals and services that we offer
- facilitate promotion of our services and fundraising.

Sharing of Information

We will share information with other organisations only where we have informed you we will do so (for example with a partner organisation), where we are legally obliged to do so (such as HMRC), or where we have gained your consent to do so (such as your GP).

In certain circumstances, there may be occasions where it is necessary to share information without your consent with other organisations in accordance with CTM Mind policies, common law and the Data Protection Act 2018 as appropriate. For example, in circumstances where disclosure is felt to be justified in the public interest e.g., to protect you or someone else from harm. In these circumstances, the information shared will always be kept to the minimum necessary. If we do this, you will be informed about who we have shared information with and why.

Legal Basis for Processing Your Data: Compliance with General Data Protection Regulations (GDPR)

We are committed to protecting your privacy and handling your personal data in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR).

When processing sensitive personal data, we must meet specific conditions outlined by the GDPR. These conditions include obtaining explicit consent, processing data to protect vital interests, providing health or social care services, fulfilling legal obligations, and processing data as a non-profit organisation for legitimate activities.

We will obtain explicit consent when necessary, ensuring it is freely given, specific, informed, and unambiguous. You have the right to withdraw your consent at any time.

In certain situations, we may process sensitive personal data to protect someone's life or vital interests, provide health or social care services, fulfil legal obligations, or carry out legitimate activities as a non-profit organization.

Your privacy and the legal basis for processing your data are important to us. Please contact us if you have any questions or concerns.

How We Store Your Personal Information

Lamplight CMS

Personal information entered onto our Database, Lamplight CMS, is securely stored on servers hosted by Amazon Web Services (AWS), located in the London region. AWS data centres are accredited to ISO27001 and comply with numerous security and Information Governance standards. For more details on compliance, you can visit (<https://aws.amazon.com/compliance/>).

SharePoint Online

We store and manage personal data on SharePoint Online within secure Microsoft data centres located in the European Economic Area (EEA). As the controllers of your personal data, we are responsible for determining how it is processed. Our trusted third-party IT service provider acts as the processor, supplying and managing the SharePoint Online environment while adhering to strict confidentiality and data protection obligations. They only access your personal data when necessary for support purposes as authorised by us. Your data may be transferred and stored within the EEA as part of SharePoint Online's infrastructure. We do not transfer data outside the EEA without your written consent and ensuring appropriate safeguards, compliance with data protection laws, and following our instructions. We prioritise the security, confidentiality, and compliance of your personal data. By using our services, you acknowledge and consent to the transfer and storage of your data.

Just Giving

JustGiving is a third-party platform that facilitates online fundraising and donations. It is important to note that JustGiving has its own privacy policy governing the collection, use, and protection of personal data. As an external source, anyone utilizing JustGiving's services should refer to their privacy policy directly to understand how their personal information is handled.

We collect and retain all relevant personal data and donation amounts that individuals input into JustGiving when setting up a fundraising page. This information is stored securely in our SharePoint Online for future reference and potential use in mailing lists.

Disposal

We take data disposal seriously to ensure the secure and responsible handling of your information. We follow established retention periods for different services, initiatives, and projects that you have engaged with. These retention periods are centrally recorded in our data asset register, which helps us keep track of how long we retain your data.

The specific retention period may vary depending on the nature of the engagement, legal requirements, and our operational needs. Once the retention period expires, we will securely dispose of your information in a manner that ensures its confidentiality and prevents unauthorised access or disclosure.

Our disposal methods may include secure deletion, shredding of physical documents, or anonymisation of data to remove any personally identifiable information. We regularly review and update our data disposal practices to align with best practices and applicable data protection laws.

Security

Keeping your personal information safe is very important to us. We have implemented appropriate physical, technical and organisational measures to protect the information we hold from improper access, use, alteration, destruction and loss.

Right to Access

You have a right, under the Data Protection Act, to request a copy of the information that is held about you. This is known as a subject access request.

Subject Access Requests must be made in writing (email requests are acceptable) and there may be a fee involved. We are required to provide the information within one month, unless it is particularly complicated or we receive a number of requests from you, in which case we can extend the time by a further two months.

Third party requests, i.e. from insurers or solicitors, must be accompanied by a consent form signed within the last 6 months.

Right to Request Rectification and Erasure (Right to be Forgotten)

We respect your rights and understand the importance of maintaining accurate and up-to-date personal information. You have the right to request rectification of any inaccurate or incomplete data we hold about you. If you believe that any information we have is incorrect, please let us know, and we will promptly update it.

Additionally, you have the right to request the erasure of your personal information, also known as the right to be forgotten. If you no longer wish for us to retain your data and there is no legitimate reason for us to continue processing it, you can request its deletion. However, please note that this right is not absolute and may be subject to legal obligations or other legitimate grounds for retaining your information.

To exercise your right to rectification or erasure, please contact us using the details provided at the end of this Privacy Policy. We will review and respond to your request in accordance with applicable data protection laws and regulations.

Our Website

This section of the policy explains how we secure and use data relating to the website, what information <https://ctmmind.org.uk/> (referred to as 'this website') collects and how the organisation, Cwm Taf Morgannwg Mind (referred to as 'we', 'us' and 'our') uses that information.

Securing your connection to our website

This website uses a SSL (Secure Sockets Layer) security certificate to encrypt and protect connections to and traffic on the website. When you are on this website, in the address bar of your web browser, you should see at least one of the following to confirm the secure connection to this website:

- A padlock symbol
- The text 'https://'; before the website address
- The words 'Secure' or 'Secure Connection'

It is up to the visitor to this website to ensure their computing devices and software are updated to the latest versions to maximise security.

Cookies

This website uses cookies to:

- help us monitor and understand how people use the website
- identify returning or repeat visitors
- manage the security of this website
- manage people logging in or out of the website.

You can block these cookies using the appropriate desktop and mobile apps for your software and system.

How Visitors Use this Website

We use Google Analytics and page tagging techniques to understand how this website is used by visitors.

Find out more what information Google collects, how it uses and protects this information [here](#). The link also provides information as to how you can opt-out of Google Analytics.

Google Analytics and this website can collect information such as:

- visitor IP address, web browser, device(s) used
- how people came to our website, time spent on web pages

- whether a visitor is logged into a restricted part of the website
- if a visitor has come to the website recently.

This information helps us:

- make sure our website meets visitor and technological needs
- know if we are providing information you need or find useful
- make best use of our charity resources to promote what we do and support people who need our services.

Contacting Us Via the Website

When you contact us through our website by leaving a comment, submitting a form, or clicking an email link, we may collect personally identifiable information, such as your name, IP address, email address, and telephone number. We are committed to collecting only the necessary information needed to address your feedback, messages, comments, or queries. Rest assured that we handle your personal information with utmost care and confidentiality. The collected information is used solely for the purpose of responding to your inquiries. We value your privacy and adhere to applicable data protection laws and regulations. If you have any concerns, please refer to our privacy policy or contact us using the provided contact details.

Contact Us

If you would like to know more, or have any concerns about how your information is being processed, or would like to make a subject access request, please contact:

Data Controller

88 High Street, Merthyr Tydfil, CF47 8UG

Tel: 01685 707480

Right to Lodge a Complaint

If at any time you think there is a problem with the way that we are handling your data you have a right to complain to us through our normal complaints procedure, details of which can be found on our website <https://ctmmind.org.uk/contact-us> , or by email to info@ctmmind.org.uk

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Date Completed:	09-06-2023
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