



Privacy policy

Your privacy is a top priority. We're committed to always being a good custodian of your personal information, handling it in a responsible manner, and securing it with technical and physical safeguards.

Statement Coverage

These are our privacy practices for our website, which can be found here:- [Ways for Wellbeing UK CIC](#). Links within these sites to other websites are not covered because we have no control over their content.

Our Commitment to you is:

- We will always ask you, at the start of our involvement with you, if "you agree to your information being shared with other agencies and professionals"
- We will always ask you, from the start, if "you agree to your data being stored for purposes of care records and reporting"
- Where appropriate, we will liaise with other referring agencies who send us information and data already collected to ask question 1 and 2 above;
- To have a "consent tab" on our data collection system that must be ticked to confirm that you have agreed to have your data stored, processed and shared by us for purposes of their care and monitoring (reporting); We will always give you access to any information we hold about you; if you ask for it and without any charge.

The Data Protection Act

Through our website you may provide personal data about yourself such as your name and email address. We have a legal duty to protect any information we collect from you (in accordance with the Data Protection Act).



We will use your information only for the purpose as described. We do not pass on your details to any other government department or third party unless you have given us permission to do so.

You have a right to access your personal data and change any inaccuracies (to ask about this, please e-mail us at info@waysforwellbeing.com).

About Us:

This "Privacy Notice" applies to all personal information processing activities carried out by Ways for Wellbeing UK CIC

- Ways for Wellbeing UK CIC operates as both a data controller and data processor in respect of personal information that we process in connection with our business (including the products and services that we provide). In this notice, reference to "we", "us" or "our" references Ways for Wellbeing UK CIC. This Privacy Notice sits within a wider Data Protection Policy. All documents relating to data protection can be read independently or as a collection within our collective policies.
- Ways for Wellbeing UK CIC is a company Registered in England and Wales No.14350512. Our Registered Address is 50 Southgate Road Birmingham B44 9AT. Website is Ways for Wellbeing UK CIC Email: info@waysforwellbeing.com
- We respect individuals' rights to privacy and to the protection of personal information. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business. "Personal information" means information about a living individual who can be identified from that information (either by itself or when it is combined with other information). We will update This Privacy Notice on a regular basis to ensure that it continues to comply with the latest regulations and best practice. We will communicate any changes to you and publish this updated Privacy notice on our website. We would encourage you to visit our website



regularly to stay informed of the purpose for which we process your information and your rights to control how we process it.

Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998 and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored, and destroyed, and irrespective of whether it is held in paper file or electronically.

How we use your Information?

We collect and process various categories of personal information at the start of, and for the duration of, your relationship with us. We will limit the collection and processing of information to information necessary to achieve one or more legitimate purposes as identified in this notice.

- You provide some of this data directly, such as when you self-refer into our services or you are referred, if you attend one of our events or training programmes as a member or non-member. Personal information may include:-
- Basic personal information, including name and address, and contact details;
- Online profile and social media information and activity, based on your interaction with us and our websites or use of our application. We may also process certain special categories of information for specific and limited purposes, such as making our services accessible to customer.

We will only process special categories of information where we have obtained your explicit consent or are otherwise lawfully permitted to do so.

This may include:-

- Health specific information
- Information about racial or ethnic origin
- Gender
- Age



- Employment Status
- Date Of Birth

How we obtain Information?

Your information is made up of all the personal information we collect and hold about you after you have been referred to our service by Primary or Secondary Care (A GP, Nurse or other Health Professional, or you have self-referred, i.e. you have decided to take up the offer of one of our services.)

What the Information is used for?

We may use the data you provide to communicate with you. Specifically, we may use your personal information in the following circumstances:-

- To provide you with access to products and services e.g.; training, forums, events.
- To manage the relationship, we have with you because you are or have received a health or wellbeing service from us.
- To carry out obligations arising from any contracts entered by you and us.
- To seek your views or comments on the services we provide.
- To notify you of changes to our services.
- To comply with health and safety obligations.
- To comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies.
- For our own business management and planning, including accounting and auditing.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents.
- To prevent fraud e.g. to prevent spam or attempts to defraud.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communication systems and preventing malicious software distribution.



- To conduct data analytics studies to review and better understand our service provision and offers including retention and attrition rates.
- In some cases, we may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights are adequately protected.

Communications about our Service or Programme provided by Ways for Wellbeing UK CIC.

We will contact you with information relevant to the operation and maintenance of your account (including updated information about how we process your personal information), by a variety of means including online web chat, email, text message, post and/or by telephone. If at any point in the future you change your contact details, you should inform us about the changes.

We record and log calls, emails, text messages and other communications in accordance with applicable laws for the purposes of our business.

- We will actively seek consent for the processing of data relating to service you receive during referral process. We will also actively seek consent on your communication preferences, which you can modify at any time. We do not need your consent if we use categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights in the field of law.
- When you engage Ways for Wellbeing UK CIC services we may approach you for your written consent to allow us to share your data with a third-party organisation or person. This is often done to support funding applications, partnership work, academic research and development and to continually improve our services offered to you. If we do so, we will provide you with full details of the information that we would like, the reason we need it, and who it will be shared with so that you can carefully consider whether you wish to consent.



How we use Sensitive Personal Information, and do we need your consent?

“Special categories” of sensitive personal information require higher levels of protection. We may process special categories of personal information in the following circumstances:-

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our data protection policies.
- Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policies.
- Where it is needed to carry out obligations of a funded project.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent, or where you have already made the information public or in the course of legitimate business activities with the appropriate safeguards.

Changes to the way we use your Information

From time to time we may change the way we use your information. Where we believe you may not reasonably expect such a change we will notify you and will allow a period of at least 30 days for you to raise any objections before the change is made. However, please note that in some cases, if you do not agree to such changes it may not be possible for us to continue providing certain services to you.

Notification of Changes in Privacy Statement



In some circumstances Ways for Wellbeing UK CIC reserves the right to change the privacy statement without notice.

Automated Decision Making

Automated decision-making may take place when we believe an electronic system is best placed to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:-

- Where we have notified you of the decision and given you 21 days to request a reconsideration.
- Where it is necessary to perform the contract with you and appropriate measures are in place to safeguard your rights.
- In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.
- If we make an automated decision based on any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.
- You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you

Data Sharing

- We may have to share your data with third parties, including third-party service providers to complete any transaction, or provide any product or service you have requested or authorised. We only permit them to process your personal data for specified purposes of us and in accordance with our instructions. We require third parties to respect the security of your data and to treat it in accordance with the law.



- We may share your personal information where required by law, or where we have another legitimate interest in doing so. When you provide payment data to make a purchase, we will share payment data with banks and other entities that process payment transactions or provide other financial services, and for fraud prevention and credit risk reduction.
- In addition, we share personal data among organisations to whom you may be referred for an additional service, in such cases, these companies must abide by our data privacy and security requirements and are not allowed to use personal data they receive from us or they have access to for any other purpose than stated.
- If you provide personal data to any of those third parties, beyond information that you explicitly allowed us to share, your data is governed by their privacy statements. We are not responsible for any such third party's use of your information.

Data Security

We recognise that the information you provide may be sensitive and we will respect your privacy. We keep information about you confidential. This means we store it securely and control who has access to it. We sometimes share personal data with third parties where we have contracted them to carry out specific tasks for us.

In such cases we carefully select which partners we work with. We take great care to ensure that we have a contract with the third party that states what they are allowed to do with the data we share with them. We ensure that they do not use your information in any way other than the task for which they have been contracted.

We will only share personal data with other organisations where we are satisfied that the other organisation is entitled to receive it and will keep your information secure.

We're committed to holding all personal data within Ways for Wellbeing UK CIC on secure systems. We're working to reduce the amount of paper-based information we hold as it is easier to secure data if it is held



electronically. The majority of psychological wellbeing personal data is held electronically.

How long we keep your Information?

Retention periods for records are determined based on the type of the record, product or service. We will only retain your personal information no longer than is necessary for the purpose for which the personal data are processed, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention are available upon request. (In most cases this will not exceed 7 years unless we are contractually obliged to do so).

Your Rights

Under the General Data Protection Regulation (GDPR) you have rights as an individual which you can exercise in relation to the information we hold about you. We want to make sure you are aware of your rights, we have described those rights and the circumstances in which they apply below.

- If you wish to exercise any of these rights, if you have any queries about how we use your personal information that are not answered here, or if you wish to complain to our Data Protection Officer, please contact us at info@waysforwellbeing.com
- Please note that in some cases, if you do not agree to the way we process your information, it may not be possible for us to continue provide certain products and services to you.
- Access – you have a right to access the personal information we hold about you. If you would like a copy of the personal information we hold about you, please write to: please write to: Ways for Wellbeing UK CIC. 50 Southgate Road, Birmingham B44 9AT.
- Rectification – You have a right to rectification of inaccurate personal information and to update incomplete personal information If you believe that any of the information that we hold



about you is inaccurate; you have a right to request that we restrict the processing of that information

Please note that if you request us to restrict processing your information, we may have to suspend the operation of your account and/or the products and services we provide to you.

Erasure

You have a right to request that we delete your personal information. You may request that we delete your personal information if you believe that:

- We no longer need to process your information for the purposes for which it was provided;
- We have requested your permission to process your personal information and you wish to withdraw your consent;

Or

- We are not using your information in a lawful manner. Please note that if you request us to delete your information, we may have to suspend services we provide to you.

Restriction

You have a right to request us to restrict the processing of your personal information. You may request us to restrict processing your personal information if you believe that:-

- Any of the information that we hold about you is inaccurate;
- We no longer need to process your information for the purposes for which it was provided, but you require the information to establish, exercise or defend legal claims.
- We are not using your information in a lawful manner. Please note that if you request us to restrict processing your information, we may have to suspend the services we provide to you.

Portability



You have a right to data portability. Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive the personal information you provided to us in a portable format.

You may also request us to provide it directly to a third party, if technically feasible. We are not responsible for any such third party's use of your account information, which will be governed by their agreement with you and any privacy statement they provide to you.

Objection

You have a right to object to the processing of your personal information. You have a right to object to us processing your personal information (and to request us to restrict processing) for the purposes described in this Privacy Notice), unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we need to process your information to investigate and protect us or others from legal claims.

Depending on the circumstances, we may need to restrict or cease processing your personal information altogether or, where requested, delete your information. Please note that if you object to us processing your information, we may have to suspend the services we provide to you.

Marketing

You have a right to object to direct marketing. You have a right to object at any time to processing of your personal information for direct marketing purposes, including profiling you for the purposes of direct marketing.

Withdraw consent

You have a right to withdraw your consent. Where we rely on your permission to process your personal information, you have a right to



withdraw your consent at any time. We will always make it clear where we need your permission to undertake specific processing activities.

Making complaints

You have a right to lodge a complaint with the regulator. If you wish to raise a complaint on how we have handled your personal information, you can contact our Data Protection Officer who will investigate the matter. We hope that we can address any concerns you may have, within a reasonable period of time in line with our organisational complaints policy but you can always contact the Information Commissioner's Office (ICO). For more information, visit <https://ico.org.uk>

If you have any questions about this privacy notice, please contact Data Protection Officer Nabila Gardner on info@waysforwellbeing.com