



Devon Mind Privacy Policy

Last reviewed by Quality & Standards Committee	November 2022
Last reviewed by legal specialists (Tozers LLP)	February 2023
Ratified by Devon Mind Board of Trustees	April 2023
Review cycle	Every two years
Next review due	April 2025
Owner	Chief Executive

www.devonmind.com

Registered charity no. 1181767

Registered company no. 10281020

1. Our privacy principles

1.1 We will look after any personal information you share with us. This is central to our values as an organisation. We want everyone who supports us, or who comes to us for support, to feel confident about how any personal information they share will be looked after and used.

1.2 You can be confident that:

- we only use personal information in the ways we need to and that are expected of us,
- we will keep you up to date with our work, including information about our services, raising awareness, and promoting understanding, as well as our fundraising activities,
- we only use your personal information to do this if you have previously told us that's okay,
- we will make it easy for you to tell us how you want us to communicate with you, including how to opt out from future communications, and we promise your requested will be respected straight away,
- we will never release your information to organisations outside Devon Mind for their marketing purposes,
- we will be especially careful and sensitive engaging with vulnerable people or those we have reason to believe might be vulnerable,
- we take all reasonable care to safeguard your personal information through security policies and secure business processes, and
- we will always provide easy ways for you to contact us; if you have any queries about data protection, we will be happy to discuss with you.

1.3 Devon Mind has a dedicated Data Protection Officer (DPO). The DPO can be reached:

- via post to Data Protection Officer, Devon Mind, Guild House, 156 Mannamead Road, Plymouth PL3 5QL,
- via email to admin@devonmind.com, and
- via telephone on 01752 512 280.

1.4 Devon Mind is registered with the Information Commissioner's Office, ICO number ZA508665.

2. How we collect personal information about you

2.1 We may collect personal information from you when you interact with Devon Mind. There are many occasions when this could happen, for example: if you enquire about our services, register with us, donate to us, ask us a question about mental health, book a place on one of our training courses or workshops, apply for a job or volunteering opportunity, provide some optional feedback, or otherwise provide us with personal information. This may be when you phone us, email us, go onto our website, through the post, or in person.

3. What information do we collect?

3.1 The personal information we collect, use, and store might include details such as your name, date of birth, email address, postal address, and telephone number, as well as information you provide in any correspondence between us.

3.2 We may also collect health information that will enable us to provide you with the most appropriate service. However, you can decide if you want to remain anonymous or if you are happy to share your personal details.

4. How do we use your personal information?

4.1 We may use your personal information to:

- provide you with the important advice and/or support you've asked us for, whether this be over the phone, via email, or other services,
- provide or administer activities relating to our services, updating you with important administrative messages, to help us identify you when you contact us, and to help us properly maintain our records,
- improve your experience with us, for example, we may use your information to enhance the service that our staff provide, to support you to fundraise for us or to make Gift Aid declarations, or to improve our information and communications,
- provide you with information about our plans – this may be letting you know about new or enhanced services that we hope will be useful and interesting to you and may include fundraising updates. Of course, we will only do this either with your consent, where we need to fulfil a contract or service with you, or where we believe you will expect to be updated and contacted by us (you can of course ask us at any time to change how we contact you), and
- we may need to disclose your information if required to do so by law, for example, to comply with applicable laws, regulations, and codes of practice, or in response to a valid request from a competent authority.

4.2 A special note about the special category information we hold:

If you contact us at Devon Mind by phone, through social media, or in other more general communications with us such as emails, you may choose to provide details of a sensitive nature.

We only use this information for the purposes of dealing with your enquiry, training, and quality monitoring or evaluating the services we provide. We will not pass on your details to anyone else without your express permission, except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others, or children contacting us and sharing serious issues.

If you provide us with any special category personal data by phone, email, or any other means, we will treat that information with extra care and always in accordance with this Privacy Policy.

- 4.3 Your personal information and details of the enquiries we receive are stored for no longer than is reasonably necessary for the purposes of its use, including for the purposes of satisfying any legal requirements. We carry out periodic deletion of data whose retention period has expired and/or when the need to continue holding such data is no longer necessary.

5. Lawful bases for processing

- 5.1 Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

1. Services

If we are providing you with a mental health service, the lawful basis on which we collect or receive personal data as a registered mental health charity is '**legitimate interest**'. This means that data processing is necessary for our organisation to provide you with appropriate support.

We may also collect and use information about your mental health in order to provide you with the service. This is ‘special category’ data, and we will treat it with extra care and confidentiality. The lawful basis under which we process special category data is that we are **providing health and/or social care services**, and we process this data only so far as is necessary for the provision of these services.

If we have an agreement or contract with you to provide a specific service, for example a training programme or counselling, the lawful basis on which we collect and process data is the ‘**performance of a contract**’. This means that we are processing data in order to fulfil — or determine if we are able to fulfil — our obligations to you under the agreement.

We will only use personal and special category data to provide and evaluate the services we provide. We will not pass on the data we have about you to anyone else without your express permission except in exceptional circumstances, the lawful basis of which is ‘**vital interests**’. Examples of these circumstances include information that suggests you might be a danger to yourself or someone else, or information about a child at risk of harm or neglect. In addition, if you lack capacity then we may share data with your registered Lasting Power of Attorney for your health and welfare.

2. Supporters

If you are supporting us, for example by making a donation, we will collect data about your identity and any other information you choose to provide us with. The lawful basis on which we collect this data is ‘**consent**’. We will ask for your consent at the point at which we collect the data from you.

The information will be used to process your engagement with us, for example, processing a donation or Gift Aid and to thank you.

We may also want to contact you with information about our work, such as events and training or other ways you can support us. However, we will only contact you in this manner if we have your **explicit consent** to do so. We will always let you know how you can stop receiving communications from us, for example with an ‘unsubscribe’ link in an email newsletter.

If you attend an event or take part in a promotional activity, we may ask to take your photograph or film you. We will need your consent in order to take and use these images fairly and lawfully.

If you share your personal experience or the experiences of a friend or relative, we may also collect this health data. This kind of sensitive information is called ‘special category’ data, and we will treat it with the extra care and confidentiality discussed above.

6. How long do we hold your information for?

- 6.1 We only keep your personal information for as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

7. How we use cookies

- 7.1 Cookies are small text files that are used to store small pieces of information. They are stored on your device when our website is loaded on your browser. These cookies help us make the website function properly,

make it more secure, provide better user experience, and understand how the website performs, what works, and where it needs improvement.

7.2 As most of the online services, our website uses first-party and third-party cookies for several purposes. First-party cookies are mostly necessary for the website to function the right way, and they do not collect any of your personally identifiable data. Third-party cookies used on our website are mainly for understanding how the website performs, how you interact with our website, keeping our services secure, providing advertisements that are relevant to you, and all in all providing you with a better and improved user experience and help speed up your future interactions with our website.

7.3 The following are the types of cookies we use:

Strictly necessary cookies:

Cookie	Duration	Description
sessionid	1 day	Squarespace sets this cookie to identify unique visitors and track a visitor's sessions on a site.
ss_cvr	1 year 1 month 4 days	Squarespace sets this cookie to identify unique visitors and track a visitor's sessions on a site.
ss_cvt	30 minutes	Squarespace sets this cookie to identify unique visitors and track a visitor's sessions on a site.
crumb	Session	Squarespace sets this cookie to prevent cross-site request forgery (CSRF).
__stripe_mid	1 year	Stripe sets this cookie to process payments.
__stripe_sid	30 minutes	Stripe sets this cookie to process payments.
ts	1 year 1 month 4 days	PayPal sets this cookie to enable secure transactions.
ts_c	1 year 1 month 4 days	PayPal sets this cookie to make safe payments.
enforce_policy	1 year	PayPal sets this cookie for secure transactions.

Functional cookies:

Cookie	Duration	Description
__cf_bm	30 minutes	Cloudflare set the cookie to support Cloudflare Bot Management.
__sharethis_cookie_test__	session	ShareThis sets this cookie to track which pages are being shared and by whom.
tsrce	3 days	PayPal sets this cookie to enable the PayPal payment service on the website.
_gaexp	1 month	Google Optimize sets this cookie to determine a user's inclusion in an experiment and the expiration of experiments a user has been included in.
LANG	9 hours	Linkedin set this cookie to set user's preferred language.
x-pp-s	Session	PayPal sets this cookie to process payments on the site.
nsid	session	PayPal sets this cookie to enable the PayPal payment service on the website.

Analytics cookies:

Cookie	Duration	Description
ga*	1 year 1 month 4 days	Google Analytics sets this cookie to store and count page views.
_ga	1 year 1 month 4 days	Google Analytics sets this cookie to calculate visitor, session and campaign data and track site usage for the site's analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognise unique visitors.
_fbp	3 months	Facebook sets this cookie to display advertisements when either on Facebook or on a digital platform powered by Facebook advertising after visiting the website.
_gid	1 day	Google Analytics sets this cookie to store information on how visitors use a website while also creating an analytics report of the website's performance. Some of the collected data includes the number of visitors, their source, and the pages they visit anonymously.
_gcl_au	3 months	Google Tag Manager sets the cookie to experiment advertisement efficiency of websites using their services.
_gat_gtag_UA_*	1 minute	Google Analytics sets this cookie to store a unique user ID.
_gat_UA_*	1 minute	Google Analytics sets this cookie for user behaviour tracking.
uid	1 year 1 month 4 days	This is a Google UserID cookie that tracks users across various website segments.
exitIntentFlag	session	This cookie is used to record the user's intention to leave the page. It also tracks the user's page views.
CONSENT	2 years	YouTube sets this cookie via embedded YouTube videos and registers anonymous statistical data.

bugsnag-anonymous-id	never	BugSnag/Juicer sets this cookie for bug reporting and other analytical purposes.
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Performance cookies:

Cookie	Duration	Description
_p_hfp_client_id	less than a minute	Elfsight sets this cookie to implement social platforms on the website and enables the social platforms to track the users by assigning them a specific ID.
l7_az	30 minutes	This cookie is necessary for the PayPal login function on the website.

Advertising cookies:

Cookie	Duration	Description
YSC	session	YouTube sets this cookie to track the views of embedded videos on YouTube pages.
VISITOR_INFO1_LIVE	5 months 27 days	YouTube sets this cookie to measure bandwidth, determining whether the user gets the new or old player interface.
test_cookie	15 minutes	doubleclick.net sets this cookie to determine if the user's browser supports cookies.
yt-remote-device-id	never	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
yt:innertube::nextId	never	YouTube sets this cookie to register a unique ID to store data on what videos from YouTube the user has seen.
yt-remote-connected-devices	never	YouTube sets this cookie to store the user's video preferences using embedded YouTube videos.
yt:innertube::requests	never	YouTube sets this cookie to register a unique ID to store data on what videos from YouTube the user has seen.
NID	6 months	Google sets the cookie for advertising purposes; to limit the number of times the user sees an ad, to unwanted mute ads, and to measure the effectiveness of ads.

- 7.4 You can change your cookie preferences at any time by clicking the ‘Cookie Settings’ button on our website. This will let you revisit the cookie consent banner and change your preferences or withdraw your consent right away.

8. Your choices

- 8.1 We like to keep all our valued supporters up to date with our progress. So, to update you on what we're doing and ask whether you'd be able to support us, where we are able to, we'd like to keep in touch with you (by post, phone, email, text, and other electronic means) about our progress and how you can continue to help us in this important mission.
- 8.2 Please be reassured that respect lies at the heart of everything our committed staff and volunteers do: we respect any information that you share with us, and you can change your mind and remove or add your consent at any time, by simply contacting our DPO.

9. Who sees your personal information?

- 9.1 The personal information we collect about you will be used by our staff (and volunteers) at Devon Mind so that they can support you, and possibly to legal and regulatory authorities if required to by law.
- 9.2 We will never sell or share your personal information with organisations so that they can contact you for any marketing activities.
- 9.3 There are certain circumstances in which Devon Mind may need to break confidentiality and share your information with other agencies
- There is immediate danger. If you have told us clearly you that you plan to take your life within the next 24 hours, or you have already taken action which puts your life in danger, but you do not want to seek support yourself and you do not give your consent for Devon Mind to do so – we will need to call 999.
 - You are planning to take action that will put others at risk. We will need to call 999.

- There is a safeguarding issue that concerns a child.

10. Your information security

- 10.1 We take the security of your personal information extremely seriously. We've implemented appropriate physical, technical, and organisational measures to protect the information we have under our control, both on and off-line, from improper access, use, alteration, destruction, and loss.
- 10.2 We only keep information for as long as is reasonable and necessary, which may be to fulfil statutory obligations (for example, collection of Gift Aid).
- 10.3 Here are some of the ways we protect your personal information:
- Offline, your personal information is kept securely in our databases and offices.
 - Our website may contain links to other websites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content, or the privacy practices employed by other sites. Please be aware that advertisers or websites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

11. Your communication with our teams at Devon Mind

- 11.1 Your communications with our teams (including by phone or email) may be monitored and/or recorded for training, quality control, and compliance purposes to ensure that we continuously improve our service standards.

12. Your rights

12.1 You have various rights in respect of the personal information we hold about you, set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our DPO. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office, at <https://ico.org.uk/>.

Access to your personal information: You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing and provide us with evidence of your identity.

Right to object: You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.

Consent: If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.

Rectification: You can ask us to change or complete any inaccurate or incomplete personal information held about you.

Erasure: You can ask us to delete your personal information where it is no longer necessary for us to use it, where you have withdrawn consent, or where we have no lawful basis for keeping it.

Portability: You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

Restriction: You can ask us to restrict the personal information we use about you where you have asked for it to be erased, or where you have objected to our use of it.

No automated decision-making: Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

12.2 Please note: Some of the rights outlined above only apply in certain circumstances and we may not be able to fulfil every request.

13. How to update or access your personal information

13.1 You may ask us at any time to update your details, correct or remove information you think is inaccurate by writing to our DPO.

13.2 You also have a right to know what personal information Devon Mind holds about you. Please contact our DPO to request this information. You will be asked to confirm your identity before we can provide you with this.