



# GDPR Policy

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## Introduction and Privacy notice

At Heads2minds, we are committed to protecting and respecting your privacy.

This Privacy Notice explains when and why we collect personal information about people who visit our website and interact with Head2minds via telephone, email and any other forms of correspondence. It covers how we use this information, the conditions under which we may disclose it to others and how we keep it secure.

We may change this notice from time to time so please check this page occasionally to ensure that you're happy with any changes. By using this website and corresponding with Heads2minds, you're agreeing to be bound by this notice. Any questions regarding this notice and our privacy practices should be sent by email to [info@heads2minds.co.uk](mailto:info@heads2minds.co.uk) or by calling Heads2minds (Liz – CEO) on 07872 014070.

## Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of Heads2minds. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

## History

Heads2minds is a charity which was set up in November 2020; we work across a wide audience in providing health and well-being, holistic therapy. Mentoring for children and young adults over the age of 11 years old to help build a relationship with someone who can offer them insights and guidance in new, fun and caring ways. SECE Mind works in partnership with Heads2Minds to deliver MHFA courses both online and in person. Heads2Minds also partners with many organisations to deliver a wide range of mental health well-being support to all ages.

Heads2Minds operates on many platforms, including online one-to-one mentoring, training, support and counselling. Face-to-face physical seminars with classes ranging from adults, young adults and children and by phone or video conferencing. Our activities are provided on a daily, weekly and monthly basis and our only limitations are the number of resources that we have to cope with the high demand which has grown exponentially since the Covid-19 Pandemic, where lockdowns caused depression and other mental deficiencies across the globe.

We are committed to creating a safe space in which anyone experiencing mental health challenges feels secure, understood, and respected. Our vision is to support children, young people and adults in achieving their mental health and well-being goals. We are driven to raise awareness and reduce the stigma around various mental health disorders.

The registered address is 4 Godbolts Industrial Estate, Coggeshall Road, Marks Tey, Essex. CO6 1HS. The charity number is 1192588.

## Information

We obtain information about you when you use the website, sign up to the newsletter, email, telephone or correspond with Heads2minds. The personal information we collect might include your name, address, email address and information regarding what pages are accessed and when.

We are a member of the ICO which is the UK's independent body for upholding information rights, therefore we are GDPR compliant.

Below is an in-depth summary of the different categories of data we may use:-

**Communication Data** that includes any communication that you send us whether that be through the contact form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. We process this data for the purposes of communicating with you, for record keeping and for the establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

**User Data** includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back-ups of our website and / or databases and to enable publication and administration of our website, other online services and business

**Technical Data** that includes data about your use of our website and online services such as your IP address, your log in data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our

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website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.

**Sensitive Data** refers to data that includes details about your physical or mental health, race or ethnicity, religious or philosophical beliefs, sexual orientation, trade union membership and armed forces background. We require your explicit consent for processing sensitive data, so when you submit your details you will be asked to provide your consent for this processing. 4 - Mental Health First Aider Support App Data - Personal data - this includes your first name, last name and email address.

**Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising. Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products and services, to develop them, to grow our business and to decide our marketing strategy. We may use Customer Data, User Data, Technical Data and Marketing Data to deliver relevant website content and advertisements to you (including social media adverts and other display advertisements) and to measure or understand the effectiveness of the advertising we serve you. Our lawful ground for this processing is our legitimate interests which is to grow our business. We may also use such data to send other marketing communications to you. Our lawful ground for this processing is either consent or legitimate interests (namely to grow our business).

## How we use your information

- Seek your views or comments on the services we provide
- Notify you of changes to our services
- Send you communications which you have requested, and that may be of interest to you. These may include information about campaigns, events, other activities and promotions of our associated companies' goods and services.
- We will not sell or rent your information to third parties.
- We will not share your information with third parties for marketing purposes.

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## Third party service Providers working on our behalf

We may pass your information to our third-party providers, agents, subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties for them to use for their own purposes, unless you have requested us to do so, or we are required to do so by law, for example, by court order or for the purposes of prevention of fraud or other crime.

## Your Choices

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us, then you can select your choices by ticking the relevant boxes situated on the form on which we collect your information. We will not contact you for marketing purposes by email, phone or text message unless you have given your prior consent. You can change your marketing preferences at any time by contacting us by email: [info@heads2minds.co.uk](mailto:info@heads2minds.co.uk) or telephone on 07872 014070.

## How can you access and update your information: your legal rights

Under data protection laws you have rights in relation to your personal data. These rights include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and where the lawful ground of processing is consent, to withdraw consent. The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any other information we hold is inaccurate or out of date, or you wish to exercise any of the rights set out above, please email us at [info@heads2minds.co.uk](mailto:info@heads2minds.co.uk). Alternatively, you can telephone 07872 014070. You will not have to pay a fee to access your personal data or to exercise any of the other rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive or refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data or to exercise any of your other rights. This is a security measure to ensure that

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personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case we will notify you.

## Link to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. Similarly, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

## Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purposes of satisfying any legal, accounting or reporting requirements. When deciding what the correct time is to keep data for we look at its amount, nature and sensitivity, potential risk of harm from unauthorised use or disclosure, the processing purposes, if these can be achieved by other means and legal requirements.

## Version Control - Approval and Review

Version No	Approved By	Approval Date	Main Changes	Review Period
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1.0	Board	Apr 23	Initial draft approved	Annually

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