

# **Privacy policy**

Arch Clinic respects the privacy of its therapists, their clients, supporters and visitors to our websites. This policy is concerned with how we collect personal information about you, what we do with it and what controls you have.

## **Your Privacy**

Arch Clinic was established in 2015 and is applying to register as a charitable incorporated organisation (CIO). The charity's aim is to provide access to a range of mental and physical therapies for the people in and around the north west New Forest . We work to provide facilities in Fordingbridge and to work in partnership to provide services to the wider community. We campaign to raise awareness of mental and physical health and wellbeing. We want to provide education so that people have skills that help give them resilience against common causes of mental and physical illness, such as stress and anxiety.

We take our duty to process your personal data very seriously. This policy explains how we collect, manage, use and protect your personal data.

Please read our <u>supporter promise</u> for more information.

We may change this document from time to time to reflect the latest view of what we do with your information. Please check back frequently; you will be able to see if changes have been made by the date it was last updated.

Refer to the sections below for more details on how and why we use your personal information:

#### Jump to:

- 1. Who are we?
- 2. What personal data we collect and how we use it
- 3. Legitimate interests
- 4. Sharing your information
- 5. Retaining your information
- 6. Your details on the web
- 7. What are your rights?
- 8. How to contact us



### 1. Who are we?

In this policy references to Arch Clinic, or the Charity, or to 'we' or 'us' are to Arch Clinic which is in the process of registering as a CIO in England and Wales. Its head office is Arch Clinic, Bartons Road, Fordingbridge, Hampshire. SP6 3HP

# 2. What personal data we collect and how we use it

#### What we need

Arch Clinic is what's known as the 'controller' of the personal data you provide to us. We will usually collect basic personal data about you like your name, postal address, telephone number, email address and your bank details if you are supporting us financially.

Sometimes we will need to collect or you will tell us other information about yourself which we will need to record such as your date of birth gender and health details. We will be very clear with you that we collect such information, our reason for doing so, and we will ask you for your specific consent and permission when appropriate

### Why we need it

We collect your personal data in connection with specific activities, such as messages for therapists, clinic lists, campaign updates, newsletter requests, registration or membership requests, product purchases, feedback, donations, competition entries, information you provide in public forums on our sites and job or volunteering applications.

The information is either needed to fulfil your request or to enable us to provide you with service. You don't have to disclose any of this information to browse our sites. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

#### Our marketing

Sometimes, with your consent, we will process your personal data to provide you with information about our work or our activities that you have requested or are expecting.

On other occasions, we may process personal data when we need to do this to fulfil a contract (for example, if you have purchased a place on a course) or where we are required to do this by law or other regulations.

Arch Clinic also processes your data when it is in our legitimate interests to do this and when these interests do not override your rights. Those legitimate interests include providing you with information on our appeals, courses, campaigning, membership, services, therapies, fundraising, newsletter requests, feedback, competitions and other activities and those of other carefully selected organisations. Please see the section on 'Legitimate Interest' for more information.



#### How we obtain your details

We will also hold information about your details so that we can respect your preferences for being contacted by us.

We collect your personal information in a number of ways:

- When you provide it to us directly.
- When you provide permission to other organisations to share it with us (including Facebook, LinkedIn or Twitter).
- When you have given it to a third party and you have provided permission to pass your information on to us.

When providing permission for 3rd party organisations to share your data you should check their Privacy Policies carefully to understand fully how they will process your data. If we collect data as you use our website in the future, we will let you know (see Section 6. below).

#### Children

If you are under 18 please ensure you obtain your parent/guardian's consent before sending any personal information to any website or to Arch Clinic. We do provide services for those under 18 so we may ask your age. Before talking to us, please ensure you speak to your parent or guardian unless you feel that your health or safety would be compromised if you do.

Please note that we will not knowingly market to or accept donations or orders for goods or services from persons aged under 18 years.

As a parent or guardian we encourage you to be aware of the activities in which your children are participating, both offline and online. If your children voluntarily disclose information, this may encourage unsolicited messages. We suggest that you discourage your child from providing any information without your consent.

#### Volunteering

When you volunteer with Arch Clinic, we will keep you up to date with the work that we are doing and events we are involved with. We will also let you know of any changes that might affect you volunteering with us and which you need to be aware of. We will only use this information in relation to your volunteering with us and whilst you remain a volunteer with us. By agreeing to volunteer with Arch Clinic you are agreeing to us to sending you emails about volunteering and your volunteer role. We will on occasion share your email address with other Arch Clinic volunteers, for instance in the process of organising an event you have chosen to attend.



#### Personal data

If you supply Arch Clinic with personal records e.g. as a therapist using our facilities or because you have a role in a volunteer project, they will be carefully stored and used by us and/or our project partners. Such records may include, for example, qualifications, video and photographs.

#### Anything else?

All the personal data we process is processed by our staff in the UK however for the purposes of IT hosting and maintenance your information may in the future be situated outside of the European Economic Area (EEA). This will be done in accordance with guidance issued by the Information Commissioner's Office.

If you would like to change the way you hear from us or no longer wish to receive direct marketing communications from then use the 'Contact Form' on the website or call 01425 650071 and speak to our Data Protection Officer.

## 3. Legitimate interests

We have a number of lawful reasons that mean we can use (or 'process') your personal information. One lawful reason is something called 'legitimate interests'. Broadly speaking Legitimate Interests means we can process your personal information if:

- We have a genuine and legitimate reason.
- We are not harming any of your rights and interests.

Please read the 'Legitimate Interest' statement for more information.

## 4. Sharing your information

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations and the following:

- If you have agreed that we may do so.
- When we use other companies to provide services on our behalf, e.g. when using auditors/advisors or processing credit/debit card payments.
- If we receive a complaint about any content you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights, property or personal safety of , our websites or our visitors and for other lawful purposes.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity.



- We may disclose aggregate statistics about our site visitors, supporters, customers
  and sales to describe our services and operations to prospective partners,
  advertisers and other reputable third parties and for other lawful purposes, but
  these statistics won't include any personally identifying information.
- If we run an event in partnership with other named organisations your details may need to be shared. We will be very clear what will happen to your data when you register.

And, we will never sell or rent your personal information to other organisations.

# 5. Retaining your information

We hold your information only as long as necessary for each purpose we use it, we will provide examples of some of our retentions in this paragraph soon to give you an idea of how long we hold your information for.

If decide not to support Arch Clinic any more or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information.

### 6. Your details on the web – cookies

Websites that you visit may be associated with online identifiers, such as internet protocol addresses, cookie identifiers or other identifiers. These may leave traces which, in particular when combined with unique identifiers and other information received by the organisation's servers, may be used to create profiles about you and even to identify you.

These traces can be deposited on any device used to access the website concerned.. This includes cookies for analytics, advertising and functional services, such as survey and chat tools. In short, when cookies can identify you via a device you are using, it is considered personal data under the GDPR.

Currently Arch Clinic does not use online identifiers on our website but information is encrypted and it has a SSL Certificate to assure visitors that the website is secure and safe to use. If in the future, we decide to use online identifiers, we will advise users of our website and give them an opportunity to act before cookies are set on a first visit. If there is then a fair notice, continuing to browse can in most circumstances be valid consent via affirmative action. We will ask for consent to use the cookies and give users the option to 'opt in' and ensure that there is an option available so that they can change their mind at a future date.

## 7. What are your rights?

A new data protection law, starting in May 2018, gives everyone a number of very important rights. These are:

Transparency over how we use your personal information (right to be informed).



- Request a copy of the information we hold about you, which will be provided to you within one month (right of access).
- Update or amend the information we hold about you if it is wrong (right of rectification).
- Ask us to stop using your information (right to restrict processing).
- Ask us to remove your personal information from our records (right to be 'forgotten').
- Object to the processing of your information for marketing purposes (right to object).
- Obtain and reuse your personal data for your own purposes (right to data portability).
- Not be subject to a decision when it is based on automated processing (automated decision making and profiling).

If you would like to know more about your rights under the data protection law see the Information Commissioners Office <u>website</u>.

Remember, you can change the way you hear from us or withdraw your permission for us to processing your personal data at any time by calling 01425 650071 or emailing <a href="mailto:info@archclinic.co.uk">info@archclinic.co.uk</a>

#### 8. How to contact us

If you wish to talk through anything in our privacy policy, find out more about your rights or obtain a copy of the information we hold about you, please contact us (details at the bottom of this page). We will be happy to help. If you wish to raise a complaint on how we have handled your personal data, you can contact our data protection officer who will investigate the matter. If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Fundraising Regulator or the Information Commissioner's Office (ICO).

Our data protection officer can be contacted by writing to:

Data Protection Officer, Arch Clinic, Bartons Road, Fordingbridge, Hampshire. SP6 1JD

If you wish to talk to us about anything in the policy or the information we hold about you please contact our supporter services team:

• By telephone: 01425 650071

• By email: info@archclinic.co.uk

 By post: Data Protection Officer, Arch Clinic. Bartons Road, Fordingbridge, Hampshire. SP6 1JD

This document was last updated: May 2018