



Policies and Protocols

Data Privacy Policy

OVERVIEW

Hope In Depression (hereafter, the Charity) is a Charitable Incorporated Organisation (CIO). Our aim is to equip people suffering from anxiety or depression, and their supporters, with well-researched information and practical advice, empowering them to be part of their own recovery.

This privacy policy explains how we use the personal data we collect from people we interact with. We are subject to and comply with the Data Protection Act 2018, PECR (Privacy and Electronic Communications Regulations) and UK GDPR (General Data Protection Regulation).

Our policy reflects our desire to respect those who share information with us. If you have any questions about how the Charity uses your personal information, or if you wish to make a data subject access request or complaint, please see Section 1.12 of this document for details for how to get in touch with us.

DOCUMENT REVISION

Revision	Who	Date	Changes
Draft 1	Tim Wears	February 2021	First draft
Draft 2	Tim Wears	February 2021	Added section about special-category data; added supporters to Sections 1.2 and 1.3; added information about online payments; referenced relevant legislation in the overview.

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1 Policy Detail

1.1 What data do we collect?

The Charity collects the following data:

- Personal identification information (Name, email address, phone number, etc.)
- Bank account details (if you set up a standing order directly with the Charity)
- Dietary information (if you sign up for an event at which we're providing food)*
- Your perception of your mental health (if you register as a course delegate)*

* This information is classed as special-category information. Please see Section 1.4 of this document for further information.

1.2 How do we collect your data?

You directly provide The Charity with most of the data we collect.

As a web site user, we collect and process data when you:

- Place an order for any of our products or services
- Use or view our website, via your browser's cookies
- Sign up for our newsletter, blog posts and other information

As a course-delivery partner, we collect and process data when you:

- Sign up as a course leader
- Sign up as a course facilitator
- Sign a partnership agreement with us on behalf of your organisation

As a delegate on a Hope in Depression course, we collect and process data when you:

- Register as a delegate on our web site
- Complete an online survey or feedback form, or provide feedback via email
- Answer questions to generate your 'progress star'
- Sign up for our newsletter

As a supporter, we collect and process data when you:

- Make a direct donation by cheque or bank transfer (including standing orders)
- Sign a Hope in Depression Gift Aid form
- Make a regular or one-off payment via our website *

* Online donations are processed by 'enthuse' – a digital fundraising platform. Further information can be found in Section 1.6 of this document.

1.2.1 Important Note for Hope in Depression Course Delegates

Hope in Depression courses are delivered by a network of course-delivery partners. When you sign up to a Hope in Depression course, the partner organisation collects and processes your data for the purposes of running the course. Partner organisations collect and process your data in line with their own data protection policies and they do not share this information with us.

If you register on the Hope In Depression web site in order to access your progress star, provide us with feedback or sign up for our newsletter, you are choosing to provide us with your information. We do not share your personal information with our partners, but we do share anonymised aggregated data to help them improve their course delivery. For example, we may provide course-delivery partners with a summary of their delegates' feedback to encourage them and to highlight areas for potential improvement.

1.3 How will we use your data?

As a web site user, to:

- Process orders
- E-mail you our newsletter, blog posts and information about up-and-coming courses (only with your explicit consent)

As a course-delivery partner, to:

- Manage our partner onboarding process
- Manage your ongoing partner status, including subscription and fees
- Receive feedback from course leaders and facilitators
- Contact course leaders and facilitators for ongoing support and encouragement and with relevant information

As a participant / delegate on a Hope in Depression course, to:

- Manage your opt-in subscriptions
- Provide you with your progress star documents
- Receive your feedback
- Compile pseudonymised and anonymised aggregated data for quality assurance, course improvement, statistical and research purposes

As a supporter of Hope in Depression, to:

- Manage and track donations
- Manage and track gift aid claims and payments
- Keep you informed of new developments and fundraising initiatives

1.4 Special-Category Data

Some sensitive personal information is classed as ‘special-category data’ under UK GDPR. Section 1.1 of this document defines dietary information and mental health information as the two types of special-category information that the Charity collects. (Dietary information is considered to be special-category information because it could be used to infer someone’s religious beliefs.)

In order to process special-category data, UK GDPR requires us to ‘identify both a lawful basis under Article 6 and a condition for processing special category data under Article 9’. The Charity complies with these conditions by obtaining your explicit consent to process this data. This satisfies Article 6 (a) and Article 9 (a):

Article 6 GDPR – Lawfulness of processing

(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes

Article 9 GDPR – Processing of special categories of personal data

(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

1.5 Data Sharing

The Charity will never share your personal information with a third party except where required to do so by law, or in the case of a safeguarding issue where a significant risk of serious harm has been identified against you or someone else.

1.6 How do we store your data?

Personal data is stored and processed electronically. The Charity uses industry-standard cloud-based IT systems, operated by reputable multi-national organisations that offer world-class physical and electronic data security. The Charity uses strong passwords and, where available, multi-factor authentication on all IT systems to minimise the risk of unauthorised access.

1.6.1 Online Donations

Online donations are [processed securely](#) by ‘enthuse’ – a digital fundraising platform. The Charity has access to your contact details in order to manage gift aid and supporter communication, but we do not have access to your bank account or credit card details: these are [stored securely](#) by enthuse.

1.6.2 Data Retention

We will keep your data for as long as we need it to fulfil the purpose for which it was collected. It will then be deleted or anonymised and aggregated in line with our Data Retention Policy. You can ask us to delete your data at any time. See Section 1.8 of this document for further information.

1.7 Marketing

We will only send you our newsletter, blog posts and other information with your explicit consent. Every e-mail we send includes the option to unsubscribe.

1.8 What are your data protection rights?

The Charity would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data. We don't usually charge a fee for this, but we reserve the right to in certain circumstances.

The right to rectification – You have the right to request that the Charity correct any information you believe is inaccurate. You also have the right to request The Charity to complete the information you believe is incomplete.

The right to erasure – You have the right to request that the Charity erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that the Charity restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to the Charity's processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that The Charity transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us using the information in Section 1.12 of this document.

1.9 Cookies

Cookies are text files placed on your computer to collect standard Internet log information and visitor behaviour information. When you visit our website, we may collect information from you automatically through cookies or similar technology

For further information, visit www.allaboutcookies.org

1.9.1 How do we use cookies?

The Charity uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in
- Understanding how you use our website
- Helping us know it's you when you visit our website in the future

1.9.2 How to manage cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

1.10 Privacy policies of other websites

The Charity's website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

1.11 Changes to our privacy policy

The Charity keeps its privacy policy under regular review and updates this document with any changes.

1.12 How to contact us

If you have any questions about the Charity's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us:

E-mail: dataprotection@hopeindepression.org

Call us on: 01344 944490

Or write to at: The Dell Hurst Lane, Egham, Surrey, TW20 8QJ

1.13 How to contact the appropriate authority

Should you wish to report a complaint, or if you feel that the Charity has not addressed your concern in a satisfactory manner, you may contact the Information Commissioner's Office on 0303 123 1113, or through their web site: www.ico.org.uk