

Rethink Mental Illness delivers the CandO (Connect and Offload) helpline within Gloucestershire.

Rethink Mental Illness takes great care to preserve your privacy and safeguard any personal details you provide to us, whether on this website or by another means. This policy explains how Rethink Mental Illness uses your personal information, how we preserve your privacy and safeguard your information, and details your rights regarding the information we use.

Rethink Mental Illness is one of the largest charitable providers of services for people severely affected by mental illness and we have relationships with fundraisers, supporters and volunteers, so we use personal information every day.

Rethink Mental Illness is a registered charity in England (271028), a company limited by guarantee in England (1227970) and authorised and regulated by the Financial Conduct Authority (624502).

When dealing with your personal information we will at all times comply with the UK GDPR, Data Protection Act 2018 and any other applicable legislation.

By using our website or providing us with your personal information you are agreeing to this Policy. We update this Policy from time to time, for example to keep it up to date in line with the UK General Data Protection Regulation and other applicable legislation, so please check it regularly. We will communicate changes as often as we can.

How we collect information about you?

We may collect personal information from you when you:

- 1. become one of our members;
- 2. apply for a paid or unpaid role within Rethink Mental Illness, for the processing of your application;
- 3. make a donation to us;
- 4. order materials or training from us;
- 5. use one of our services, including our national advice service (correspondence between you and the advice service will remain confidential);
- 6. visit our website or social media pages; or
- 7. contact us or become involved with us in another way, for example with our governance, as a campaigner, fundraiser or as a volunteer.

What personal information do you collect?

Personal information is any information about an individual from which that person can be identified. It does not include anonymous data (where the person's identity has been removed).

We collect the following kinds of personal information:

- your name
- your contact details (including postal address, telephone number, email address)
- your date of birth
- your gender
- age, nationality, and ethnicity information for monitoring purposes
- your bank or credit card details where you provide us with these to make a payment
- if you apply for a job or volunteer for us, information necessary for us to process your application and assess your suitability – this may include things such as your employment status or unspent criminal convictions
- your donation history and information as to whether you are a taxpayer to enable us to claim Gift Aid
- details of your connection to the charity, including your link to mental illness (if you choose to provide this information)
- information to support our work in identifying major donors, to understand their philanthropic interests and to complete and necessary due diligence
- where you have left us a legacy, information regarding the Executors of the Will which you may have provided us
- information about your activities on our website or social media platforms when you interact with us, for example your IP address (see further details on this below)
- information about your income and the money you owe and creditors, where we are providing advice and information on income and debts
- any other personal information you provide to us

We may also collect special category data. This is certain types of personal data that is considered to be more sensitive. Examples of special category data are information about your health, race, religious beliefs, political views, trade union membership, sex life or sexuality or genetic/biometric information. In particular, we may collect special category data about your health in some circumstances. We have included further details about this below.

We will make it clear to you why we are collecting this type of information and tell you what it will be used for. For example, we may need this information to provide you with support if you are using one of our services. We will keep special category data in strict confidence – only those members of staff who need to see or report on this information can see it.

How we use personal information?

We will use personal information to:

- provide you with a support service
- administer your donation or support your fundraising (including processing Gift Aid)
- keep a record of your relationship with us
- respond to queries, requests and complaints
- send you correspondence and communicate with you (see supporter section below)
- check for updated contact details against third party sources so we can stay in touch

with you

- understand how we can improve our services by carrying out evaluations
- generate reports on our services and our work
- manage Rethink Mental Illness events
- further our charitable objectives
- safeguard our staff and volunteers
- process your application for a job or to volunteer, and retain employment records if

you are successful

- conduct training
- audit and administer our accounts
- · carry out fraud prevention and money laundering checks
- · establish, defend, or enforce legal claims
- conduct due diligence
- to carry out research to find out more information about our supporters' and prospective supporters' backgrounds and interests understand how you engage with us through our website to enable us to improve user experience
- administer our website, perform data analysis, research, generate statistics and surveys related to our technical systems
- display content to you in a way that is appropriate to the device you are using, for example if you are using a laptop or a mobile device (we use Hotjar to do this – you can read their <u>Privacy Policy</u>)
- test our technical systems to ensure it is working correctly
- meet our legal obligations, for example a contract or our obligations to regulators, government and law enforcement bodies

Marketing and profiling

We want to keep in touch with our supporters about the work we do, and tell you about the amazing difference you're making, and how your support (both financial and non-financial) could help more people severely affected by mental illness. We will only keep in touch with you by e-mail and SMS/ text message if you tell us via our contact preferences forms that you are happy for us to contact you (this is 'opting-in') in these ways.

'Marketing' is defined as anything which 'furthers the aims of the charity' and includes things like our newsletter, fundraising appeals and campaigning actions like us asking you to sign a petition or email your MP.

If you give us your address, we will write to you to keep you updated about our work, appeals, campaigns and events (this is postal marketing, to which we apply legitimate interest), and will continue to do so, unless and until you tell us that you would no longer like to receive this marketing.

Similarly, if you give us your telephone number, we may call you to keep you updated about our work, appeals, campaigns and events (this is telephone marketing, and we also apply legitimate interest to this activity), unless you have indicated that you would not like to receive any telephone marketing by signing up for the Telephone Preference Service and/or if you tell us that you would not like to receive any marketing calls from us specifically.

Where we have your consent to use your details for marketing, you can withdraw it at any time by contacting us at supportercare@rethink.org or 0121 522 7007 or FREEPOST Rethink Mental Illness.

We might personalise our communications to you (for example by looking at donations you have already given us and sorting them by date, subject, frequency and amount), and use this to decide if and when we ask you again. It makes communications more relevant to you and is based on behaviour – not by purchasing data from outside sources.

Please note that where you have opted-out of receiving marketing communications from us we may still need to contact you for administrative purposes, for example, if there is a problem with a payment or in relation to your gift aid declaration.

Why we ask for information about your interest in mental health?

Sometimes we may ask you what your link is to mental illness. For example, if you have a mental illness yourself, or if a friend or relative of yours does, or if you have another connection to mental illness.

We ask for this information so we can understand more about people who support us. It can help us to provide you with information that is more relevant to you; it can help us represent you better in our campaigning work; and it helps us ensure we are carrying out diversity and inclusion best practice, and best practice within our own governance.

If you are happy for us to keep this information, we will treat it with strict confidence. If you do not want us to have this information you do not need to provide it.

Do you profile my data for marketing and fundraising purposes?

Yes, we do segment existing supporter data, for example, at postcode level, in order to see if we can find new supporters of a similar profile.

We may create a profile of your interests, preferences and ability to donate. At Rethink Mental Illness, our work is only made possible thanks to the generosity of our supporters, so it's vital that our fundraising efforts are as effective as they can be. By developing a better understanding of our supporters through researching them, including using publicly available sources, we can tailor and target our fundraising events and communications (including volunteering opportunities) to those most likely to be interested in them. This enables us to make appropriate requests to those who may be willing and able to donate more than they already do, or leave a gift in their will, and allows us to be more efficient and cost-effective with our resources and in the way that we raise funds. It also helps to ensure communications are relevant and timely, and reduces the risk of someone receiving information that they might find irrelevant, intrusive, or even distressing, so that we can provide an improved experience for our supporters.

Our [major donor team] uses information that is already in the public domain (information that has been published in print or online) to identify high net worth individuals who may be interested in supporting our work with a major gift. This might also include estimating their gift capacity, based on their visible assets, history of charitable giving and how connected they are to Rethink Mental Illness.

The publicly available sources of information we use include Companies House, the electoral register, the phone book, the Charity Commission's Register of Charities, Who's Who, LinkedIn, company annual reports, and articles in newspapers and magazines. We do not use publicly available sources which we consider would be intrusive for this purpose, such as Facebook, X, JustGiving, the Land Registry, online planning applications, or websites that are like these.

We also carry out research to identify existing supporters who may be able to join our major donor programme. This is based both on publicly available information, and information our supporters have given us (e.g. where a person lives, what their occupation is and their age). We may from time to time engage a specialist third party prospect research company to screen our database against their demographic database for this purpose,

We're committed to putting you in control of your data and you have the right to opt out from this activity at any time by contacting us at supportercare@rethink.org.

We are also legally required to carry out checks on individuals who give us large donations, to comply with our duties in respect of anti-money laundering legislation and the prevention of fraud.

Social media advertising

You may receive targeted advertisements through our use of social media tools. This will depend on your settings or the privacy policies for the social media platforms. For example, we use Facebook/Meta 'Custom' and 'Lookalike Audiences' programmes, which enable us to display adverts to our existing supporters or other people who have similar interests in organisations like us.

In order to use these tools, we may provide your data (including your name and email address) to Meta or the relevant social media platforms. This is to check if you have an account and to create a 'lookalike' audience so that we can advertise to potential new supporters. Our adverts may then appear when you use the social media platform.

We work only with social media platforms that provide a facility for secure and encrypted upload of data and immediately delete any records that do not match their own user base. For more information on the social media platforms we use, and to manage your social media ad preferences, please see:

Meta Custom Audiences Guides

Meta and Instagram Data Policy

Google Privacy Notice

LinkedIn Privacy Policy

Reddit Privacy Policy

Tik Tok Privacy Policy

When we engage with Meta to identify you on their platform and provide you with our adverts, we are joint controllers of your personal information with Meta. Our agreement with Meta sets out our responsibilities to you – for example, we are responsible for informing you about this activity. Rethink Mental Illness and Meta are both responsible for keeping your information secure. You can exercise your privacy rights with either of us individually.

We do not currently advertise on X (Twitter) but should this change, we will update this policy and follow the same standards of quality and protection of your data.

We do not collect remarketing data for users who have visited our advice and information pages.

If you do not want us to use your data for social media advertising you can opt-out by contacting us at supportercare@rethink.org or 0121 522 7007 or FREEPOST Rethink Mental Illness.

You may still see adverts related to us even if you have asked us not to use your information for targeted advertising because the social media platform or advertising network may hold information about you (such as your age, location or websites you have visited) that was not provided by us.

Data collected by us (such as the fact that you visited a Rethink Mental Illness page) may also be shared with Meta via our use of Meta Pixels. Meta Pixels are snippets of

code the allows us to track visitor activity on certain pages of our website and display (or 'retarget') Rethink ads and information on a person's Meta account (e.g. Facebook profile) when then visit that platform. Meta uses this information to display our ads on your social media page and to create 'lookalike' audiences as detailed above. This allows us to better reach people who may be interested in supporting us. For more information about Meta Pixels and how you can opt in or out please see our Cookie Policy.

Legal basis for processing your information

Data protection laws require us to have a "legal basis" for processing your personal information. The relevant legal bases are set out in current UK data protection legislation.

Consent: We ask you if we can use your personal information in a certain way, and you agree to this. Where we use your information for a purpose based on consent, you have the right to withdraw your consent at any time. Where necessary, we may seek to renew consent you have given at appropriate intervals in line with our internal policies.

Contract: We have a basis to use your personal information where we are entering into a contract with you or are performing our obligations under that contract. An example of this would be applying to work with us.

Legal obligation: We use your personal information to comply with one of our legal or regulatory obligations. For example, we may need to share your information with the Police or regulators such as the Information Commissioners Office or Charity Commission.

Vital interests: We may use your personal information where it is necessary for us to protect health or life. For example, we may pass your personal details to the emergency services.

Legitimate interests: We have a basis to use your personal information if it is reasonably necessary for us to do so and in our legitimate interests. Some examples of us using personal information under "legitimate interest" are:

- Where you have given us your details we may use them to process your
 donation to us to set up and fulfil your membership, e.g. to send out copies of
 Your Voice to you or to contact you and HRMC for Gift Aid. This counts as a
 type of contract because you asked us to do this for you.
- If you attend one of our services we will keep professional records of the support we've given you and who else is involved in your care
- Where we want to send you marketing communications by post or phone.
 Please note that when we market to you using email or text (or some other electronic means), we will usually rely on consent to do so.

Where we process your special category data, we must satisfy a further condition, as well as establishing a lawful basis. For example, in order to collect your health data:

- We rely on the condition that this is necessary for the purposes of the provision of healthcare or treatment, if we are using the information to provide you with our services; or
- We will obtain your explicit consent, making clear what data we are collecting, our purposes for doing so and anyone we might share your data with.

How do you keep my information secure?

We will take precautions to prevent the loss, misuse, or unauthorised alteration of personal information you give us. For example, our website does not store your personal information when you enter it into one of our contact preference forms – it links directly to our secure database.

We may send communications to you by email. Email is not a fully secure means of communication, and whilst we do our utmost to keep our systems and communications protected, we cannot guarantee this.

We make no representations about any other websites, and when you access any other website through a link on our website (including social media sites) you should understand that it is independent from us and that we have no control over that website or the way your personal information is collected through those websites.

Those websites may have their own privacy policies and we encourage you to look at those policies or contact the website operators directly to understand how your personal information is used.

Most of our data storage and transfer solutions are based in the UK or European Economic Area (EEA); however, we do use a cloud-based email marketing solution that is based outside of the EEA. All data is stored and transferred in accordance with current Data Protection regulations. Where data is sent outside of EEA, we have Standard Contractual Clauses in place to ensure the same level of data protection security is applied. -

How long do we keep your information?

We will keep data for only as long as it makes sense to do. We will take the following into account when determining the retention period for personal data:

 the purpose for which we process your personal data and how long we need to keep it in order to achieve that purpose

- how long the information is likely to remain accurate
- how long the information might be relevant to possible future legal claims
- any applicable legal, reporting, regulatory or accounting requirements which specify how long certain records need to be kept

In general, we will review your data and delete or minimise that which we have no reason to keep.

If you ever change your mind about your marketing choices, you can update your contact preferences at any time by calling us on 0121 522 7007, on supportercare@rethink.org or at FREEPOST Rethink Mental Illness, or by returning to a contact form on this website and changing your preferences yourself.

Any choices you make will overwrite any previous preferences you told us. This helps us record the most up-to-date information for you.

If you don't want us to hold your data at all anymore, we have a duty to let you know that the best way for us to be sure we don't contact you again is to *minimise* the data we hold (e.g. reduce it to name and last known address) and then 'block' those details from contact rather than delete them completely.

It's best practice (from the Information Commissioner's Office) to hold 'suppressed' records rather than to delete completely, so that we can make sure we're never able to accidentally acquire a person's details again – that way we can recognise the address and prevent contact to it.

If you have a special reason for us to delete all record of you – just let us know.

Sharing your information with other organisations or individuals

We will never sell your data to another organisation.

We may share your personal information with third parties in certain circumstances, including the following:

- partner organisations that we work with as part of our services and campaigns including Mental Health UK;
- with contractors, suppliers, or other third parties that provide services on our behalf (such as our printers, website host providers and payment processors);
- as part of a merger or other transfer of all or part of our assets or services to another organisation;
- pursuant to a court order or other legal process or as otherwise required or requested by law, regulation, or government authority programs, or to protect our rights or the rights or safety of third parties;

- pursuant to our obligations to make declarations to specific regulators, including the Charity Commission, HMRC, Companies House and/or data protection authorities;
- · with our professional advisors, lawyers, accountants and auditors; or
- with your consent or as otherwise disclosed at the time of data collection or sharing.

If we ever need to send data to a third party (for example to our printers to send you a magazine you asked for), we will make sure the company we use has signed a data processing agreement with us, so that they are bound to take care of your data in the same way we do.

Our partners at Engaging Networks (who manage large e-campaigns for us where we might encourage supporters to email their MP) use the exact same wording on their sign-up page to our campaigns as we use on our own website and must treat your data with the same care that we do.

Please see section 6 for information about the safeguards we have in place for when transferring data outside of the EEA.

If you require any further information on our third party providers, contact us at supportercare@rethink.org.

How we use cookies on our website?

For information on how cookies are used on our website, please see our <u>Cookie</u> Policy.

Some uses of cookies (like helping you to fill out forms) may be replaced by 'Local Storage' in the coming years – we will update our Policy if we adopt this, to keep you informed. There are also potential changes to the 'E-Privacy' regulations coming in the future relating to the use of data by cookies and similar technologies – again, we will update our Policy to reflect any changes that we make and will use reasonable efforts to inform you of these changes.

Your rights

UK Data Protection law provides you with rights over the personal information we hold about you.

Right to access your personal information

You have the right to request to access to and/or request a copy of the personal information we hold about you. We will provide you with this information unless legal exemptions apply.

Right to have your inaccurate information corrected (right to rectify)

You have the right to have inaccurate or incomplete information we hold about you corrected. If you believe the information we hold about you is inaccurate or

incomplete, provide us with details and we will review, and where applicable, correct any inaccuracies.

Right to restrict use

You have the right to ask us to restrict the processing of some or all of your personal information. You can request this if; some information we hold on you isn't right; we are not lawfully allowed to use it; you need us to retain your information in order for you to establish, exercise or defend a legal claim; or you believe your privacy rights outweigh our legitimate interests to use your information and you have objected to us doing this.

Right to erasure

You have the right to ask us to delete some or all of your personal information. If we are unable to delete your information, as there are some exceptions where we are unable to delete personal information, we will explain why this is.

Right for your information to be portable

You have the right to receive your personal information in a commonly used format and to request that we provide the information to another provider (data controller).

Right to object to the use of your personal information

If we are processing your personal information, you have the right to object to the processing of that data at any time. If you request this, we will stop processing your data.

In relation to all of these rights, please email or write to us at the address below. Please note that we will require proof of identity in order to carry this out and ask you the scope of the request you're making, so that we can best help you within the applicable timeframe of one month (in accordance with the Information Commissioner's Office guidelines).

In certain circumstances (for example where required or permitted by law) we might not be able to provide you with access to some of your personal information, but where appropriate we will notify you of the reasons for this.

How to contact us?

If you wish to exercise any of the rights above, please contact our Data Protection Officer, Tanya Srikandan. You can contact her at data.enquiries@rethink.org or on FREEPOST Rethink London.

If you have any questions about this policy, please contact us at supportercare@rethink.org or 0121 522 7007 or FREEPOST Rethink Mental Illness.

Please contact us using these details if you have any concerns about our data protection practices: we would appreciate the opportunity to discuss and resolve any questions or concerns that you have in the first instance.

You also have the right to make a complaint to the Information Commissioner's Office (www.ico.org.uk) or if it as about our fundraising practices in relation to data, you can contact The Fundraising regulator using their complaints form at www.fundraisingregulator.org.uk or on 0300 999 3407.