

## Foundation for Positive Mental Health - Privacy Policy

Your privacy is important to us and we take care to safeguard it. This policy explains how we use such personal information as we may hold about you that we may gather from your contact with us, for example from emails, your use of our website, attending workshops, webinars, telephone calls or any other means. [ For our privacy policy for our website see <http://www.foundationforpositivementalhealth.com/privacy-policy/> ]

The Foundation for Positive Mental Health (“FPMH”, “we” or “us”) is committed to protecting and respecting your privacy in connection with your use of our products, services and features thereof (the website, [www.foundationforpositivementalhealth.com](http://www.foundationforpositivementalhealth.com), products, services and features are collectively referred to herein as the “Product” or “Products”, which may be updated from time-to-time at the sole discretion of FPMH). This privacy policy (“Privacy Policy”) and any other documents referred to herein set forth the basis on which any personal information we collect from you, or that you provide to us, in connection with the Products will be processed by us. Please read the following carefully to understand our practices regarding your personal information and how we will collect, use and disclose your personal information.

### 1. Changes

Our privacy policy is regularly reviewed to make sure that we continue to serve your privacy interests. We reserve the right to modify or otherwise update this privacy policy and these changes will be posted on our website. We encourage you to visit this page from time to time to ensure that you are aware of any changes we may have made.

### 2. Other Important Legal Information

For information about using our services, website or purchasing goods or services from us, please also read our Terms and Conditions. [<http://www.foundationforpositivementalhealth.com/terms-and-conditions/> ]

### 3. Information We May Collect From You

We may collect and process the following information about you:

- a. Personal information including, for example, your name, e-mail address, telephone, payment information and information about your usage of the Products that may identify you as an individual or allow online or offline contact with you as an individual.

- b. Evaluation data from monitoring our Products.
- c. Facebook profile information, such as name, email address, and Facebook ID, if you choose to log in to the Products through Facebook.
- d. Device Information such as operating system version, device type, and system performance information. The information we collect via our website may also include your IP address (this is your device's individual identification number that is assigned to it when connected to the Internet) which is automatically logged by our web server.
- e. Your personal page on our Website also collects completed mood questionnaires if you choose to do them. These are not linked to your personal data, such as your email nor ip address.

#### **4. What We Do With Your Information**

We collect your personal information to allow us to fulfil our service to you such as registration of training workshops, online training workshops, evaluation of Products and gift vouchers. We evaluate our Products to allow us to monitor the quality of our services to you.

By signing up to our mailing list you agree to us contacting you. We will continue to hold, store and contact you on the basis of a 'Legitimate interest' under the new GDPR regulations, (General Data Protection Regulation) which means that maintaining contact with you is necessary for us to fulfil the contract we have together, i.e. providing up-to-date information about the use of our services and in particular any changes that may affect patient access and use of the resources we supply access to.

**We do not pass your personal details on to any third party, unless as stated below.** You have the right to ask to see what personal information we hold about you and also you have the right to ask us to remove your personal information from our systems.

## 5. Statistical Analysis

We collect data for statistical analysis to evaluate our services. This data is confidential and anonymously aggregated and used to maintain and improve the quality of our service and may be used in reports for our funders and supporters. If we wish to use personal quotes, or other identifiable media such as video, we will only do this with your expressed individual written permission.

## 6. Security & Confidentiality

The security of your personal information is important to us. We follow the most recent regulatory EU and NHS standards and comply with the Data Protection Act and GDPR to protect all information submitted to us, both during transmission and once it is received.

If you have any questions about the security of your personal information, you can contact our Data Controller Dr Alastair Dobbin on [alastair@foundationforpositivementalhealth.com](mailto:alastair@foundationforpositivementalhealth.com)

We do not share your personal information with any third party, except for as described below, when this is the case they agree to comply with our GDPR governance and safeguarding of your personal data.

### a. Law Enforcement

We reserve the right to cooperate with law enforcement officials in the investigation of alleged unlawful activities of our Products or relating to our Product users. We will have no legal liability for such disclosures of your personal information.

### b. Other Sharing Of Information

- i. We may share personal information about you with our partner Positive Rewards and our data processors who provide a service to us and you.
- ii. We will not pass your information to anyone outside FPMH other than for the purposes described above, unless:
  1. we have your permission;
  2. we have to do so or are allowed to do so by law;
  3. we have a duty to the public to reveal the information; or
  4. our interests mean we must give the information (for example, to prevent fraud.)

## **7. Where We Store Your Personal Information**

All information you provide to us is stored in the cloud on secure servers using a 2 step authentication process, either with Easyspace, Google Drive or Microsoft Onedrive. Data is encrypted on its way to and from the servers and in the server. Any website payment transaction is also encrypted, using SSL technology; all payment information is stored with our payment processor. Where you have chosen a password which enables you to access certain parts of the Products, you are responsible for keeping this password confidential. We ask you not to share a password with anyone, and suggest that you change your password frequently.

Google analytics collects website traffic data. Our access to Google analytics is by a secure 2 step authentication process.

We have a data storage policy of 5 years, after that we erase all collected personal data.

## **8. Other partners**

This Privacy Policy only covers personal data collected by us. While we carefully select our partners we work with, we are not responsible for their privacy practices.

## **9. Social Media Widgets**

Our Products include social media features, such as the Facebook Like button, and widgets, such as the “Share This” button. These features may collect your Internet protocol address, which page you are visiting on or Products, and may set a cookie to enable the feature to function properly. Social media features and widgets are hosted by a third party or hosted directly on our Products. Your interactions with these features are governed by the privacy statement of the company providing it.

## **10. Your Rights**

### **11. Access**

You also have the right to request a copy of certain personal information we hold about you and you also have a right to request for any personal data we hold to be removed. To do this, simply write to us at 24 Boswall Road, Edinburgh EH5 3RN, UK

### **12. More information**

Detailed information about your rights under UK Data Protection legislation can be found on the website of the United Kingdom Information Commissioner, which is (as at the date of this privacy policy) <https://ico.org.uk/>

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