

# Mental Health First Aid England CIC

## Privacy Notice

### Introduction

At Mental Health First Aid England CIC, we are committed to protecting the privacy of the individuals whose data we process, and to meeting our responsibilities to process personal data in a way that is consistent with the principles set out in data protection laws. Looking after the data you share with us is hugely important, and we want you to feel confident that your data is safe and secure.

This Privacy Notice tells you what to expect us to do with your personal information when you contact us or use any of our products or services. It will explain our lawful basis for processing your information, for what purposes we are processing it, the reasons and conditions under which we may share it with others, and your legal rights in respect to that information.

Unless otherwise stated, the data controller for the purposes of this notice is Mental Health First Aid England CIC. Please take a moment to familiarise yourself with our privacy practices and let us know if you have any questions by contacting us using the details set out below.

### Who we are

Mental Health First Aid England CIC is a social enterprise that offers expert guidance and training to support mental health. Our vision is to improve the mental health of the nation. We will achieve this through our mission to train one in ten of the population of England in mental health knowledge, awareness, and skills.

MHFA England CIC is a registered company limited by guarantee (**no. 7021392**).

The registered address is **21 Prescott Street, London, E1 8BB**.

MHFA England CIC is registered under the Information Commissioners Office (registration reference: **Z2064743**).

## How do we collect information about you?

We will only collect information about you as allowed by law. We may collect it directly from a range of sources and in relation to any of our products and services, including:

- When you book and attend a course or event.
- Using our website.
- Making an enquiry.
- Subscribing to our newsletter or resources.
- Through your application to our MHFA England Instructor Training Programme.
- Accessing Enabley (MHFA England Online Learning Hub).
- Accessing our MHFAider Support app®.
- Connecting via social media.
- If you have applied for a job with us.
- Any other correspondence via email or telephone.

We collect data indirectly from other legitimate sources such as via our Instructor Members, who deliver education and training courses on behalf of MHFA England. Instructor Members can operate independently, work on behalf of other training organisations, or are employed in-house. Therefore, please refer to the Lead Instructors Privacy Notice for more information on their privacy practices and how they process your personal data.

For workplace course deliveries we may receive information about you as provided by your employer, in which case please refer to your organisations Privacy Notice for further details. If you are an employer providing personal information about your employees or other individuals, we'll assume that you have obtained their consent or are acting in their legitimate interests. We'll process their personal information according to this Privacy Notice, so please encourage them to read it if they want to find out more.

Where we are required to collect personal data by law, or under the terms of the contract between us, and you do not provide us with that data when requested, we may not be able to fulfil the contract. If you do not provide us with the requested

data, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

## What personal data is being collected?

The personal information we collect from you will differ depending on the product, service, or purpose. The information we collect may include:

- Personal details (for example, your name, date of birth).
- Contact details (for example, your postal address, email address and telephone contact).
- Information concerning your identify (for example, photo identification, passport information, National Insurance number).
- User login and subscription details (for example, login credentials).
- Employment details (for example, organisation name, job title).
- Market research (for example, information provided through feedback and surveys).
- Marketing and sales information (for example, details of the services you receive and preferences).
- Cookies and similar technologies we use to recognise you and tailor content.
- Other information that you give us by filling in forms, applications, or by communicating with us, whether face-to-face, by phone, email, online, or in other ways.
- Information about your device or the software you use.

If you purchase a product from us, your card information will not be held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit / debit card transactions.

The personal information we collect may also include special category data. This is considered sensitive data relating to your racial or ethnic origin, religious or philosophical beliefs, sexual orientation, or physical or mental health. We will only process these special categories of personal Information when we are required to do so because of legal requirements imposed on us or after obtaining your explicit consent. All special category data collected from learners is done so anonymously.

## **Our legal basis for processing your data**

We are required by law to set out in this Privacy Notice the legal grounds on which we rely to process your personal information. We rely on one or more of the following lawful grounds when we use your personal information:

- The processing is necessary for compliance with a legal obligation we have such as keeping records or providing information to a public body or law enforcement.
- The processing is necessary to perform our contract with you in delivering our products or services.
- The processing is necessary for the purposes of a legitimate interest pursued by us or a third party (and are not outweighed by your privacy interests), such as the delivery of our website and related services offered to you.
- You have provided clear and explicit consent to us processing your information for a specific purpose.

Please note that in certain circumstances it may be still lawful for us to continue processing your information for additional purposes as outlined under certain conditions stated by law.

## **For what purpose do we process your personal data?**

We will only use your personal data for the original purpose it was collected for, or a reasonably compatible purpose if necessary. If we need to use your personal information for a separate additional purpose, we will let you know and explain the legal grounds for processing. We may process your personal data without your knowledge or consent only when this is permitted by law.

We may use your information to:

- Deliver our products and services.
- Process orders that you have submitted.
- Carry out our obligations arising from any contracts entered into by you and MHFA England CIC.
- Seek your views or comments on the products and 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.
- Recruitment and business development.
- Conduct research or provide statistical reporting.
- Maintain our accounts and records.
- Protect our legal rights and comply with our legal or regulatory requirements.
- Carry out your instructions (for example, exercising your rights).
- Manage our relationship with you.

Below is an in-depth summary of the different categories of data we may use and the lawful grounds for processing.

### **Communication data**

This includes any communication that you send us whether that be through the enquiry form on our website, through email, text, social media messaging, social media posting or any other communication that you send us. Our lawful ground for this processing is our legitimate interests which, in this case, are to reply and record communications sent to us, to maintain records, and to establish, pursue or defend any legal claims.

### **Customer data**

This includes data relating to any purchases of goods and / or services such as your name, title, billing address, delivery address, email address, phone number, contact details, purchase details and your card details. We process this data to supply the goods and / or services you have purchased and to keep records of such transactions. Our lawful ground for this processing is the performance of a contract between you and us and / or taking steps at your request to enter such a contract. If personal information has been provided to us indirectly from an alternative source, our lawful basis for this processing is in our legitimate interests.

### **User data**

This 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. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and perform standard business operations.

## **Technical data**

This includes information that identifies your device, its operating system, internet address, your sign-in data, browser and plug-ins, location, where you came to our site from and where you go when you leave, as well as how often you visit. The source of this data is from our analytics tracking system. Our website may also use the Click Dimensions website recording service. Click Dimensions is a product which may record mouse clicks, mouse movements, page scrolling and any text keyed into website forms. 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 to improve your marketing experience.

## **Marketing data**

This includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. This includes marketing by post, email, telephone, text, our MHFAider Support App, or advertising to you online and on social media. 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 either consent or our legitimate interests. For direct marketing we aim to gather your consent prior to the sending of any communications to ensure we adhere to all current privacy regulations.

## **Use of cookies**

Like many other websites, the MHFA England CIC website uses cookies. “Cookies” are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. It is possible to switch off cookies by setting your browser preferences. For more information, please click ‘Learn more’ on the cookie consent banner when

you access our website. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and to improve your marketing experience.

### **MHFAider Support App® data**

This includes login credential such as your first name, last name, and email address which we collect to create a login to use our app and enable you to use the app's features. We retain your personal data for as long as you remain an active user of your account. If your app subscription ceases your account will be deactivated and your personal data deleted. Our lawful ground for this processing is the performance of a contract with you.

The reflective notes are automatically encrypted and stored in our secure cloud environment. The duration, date, situation, and any signposting tags are taken, anonymised and used for reporting purposes in which individuals are not identifiable. User data, that includes data about how you use the app, is anonymous, and we process it to understand how many users are accessing the signposting options and resources, and to inform us whether we continue to provide them and how we can expand on the resources available. Aggregated user data may be shared with third parties who are signposted to within the app, to help them understand the take-up of their services. Our lawful ground for this processing is our legitimate interests.

### **Who might we share your information with?**

MHFA England will not sell or rent your information to any third-party, nor will we share your information with any third-party for the purposes of direct marketing. We will only share your information with others when legally permitted to do so.

In some circumstances we may use third-party data processors to provide elements of our products and services to you. We have processing agreements in place with our data processors which cover the handling of personal information, and details the measures and controls required to protect and secure it. This means that third parties cannot process your personal information for any other purpose unless we have instructed them to do so. They are not permitted to share your personal information with any organisation apart from us.

We may share aggregated or anonymised information outside of MHFA England for publications or statistical purposes; however, you won't be identifiable from this information and therefore will not fall under the scope of privacy laws.

MHFA England may share your information with third-party service providers to:

- Carry out your requests.
- Provide our products and services.
- Respond to your enquiries.
- Make materials available to you.
- Process payments.
- Provide customer service, postal or delivery services.
- Support our IT infrastructure.

Below is an in-depth summary of the different third-party services that we may be required to share your personal data with, and under what circumstances. Where we provide links to websites of other organisations, this Privacy Notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.

## **Instructor Members**

If you are attending one of our MHFA® education and training courses, whether face to face or online, we will share your personal information with your assigned Instructor. This is to ensure the Instructor Member can notify you of essential course details, provide necessary materials, ascertain attendance and completion of the course, and ensure you receive any additional assistance you may need.

Instructor Members are not directly employed by MHFA England. Instructor Members can operate independently, work within other training organisations, and can be employed in-house. All Instructor Members are bound by the terms and conditions of our membership agreement and must adhere to data privacy and confidentiality clauses to help protect your personal data.

Please refer to the Instructor Members own Privacy Notice for more information about how they process your personal data.



## Staci UK

As Europe's leading specialist fulfilment provider, Staci offers expert eCommerce and multichannel logistics, marketing and POS fulfilment, and spare parts logistics.

Your personal information may be shared with Staci UK to process incoming orders of MHFA England products, toolkits, materials, and bundles. You can find out more about the privacy and security of your personal information processed by Staci UK [here](#).

## Enabley Limited

The Enabley Online Learning Hub is an education and training platform that allows us to deliver our online mental health courses. Enabley provides our Instructor Members with a live classroom environment, whilst also hosting MHFA England digital content and materials.

You can find out more about the privacy and security of your personal information processed by Enabley [here](#).

## Royal Society for Public Health

The Mental Health First Aid qualification is an Ofqual regulated Royal Society for Public Health (RSPH) Level 3 Award. When registering with MHFA England for the qualification, we will share your contact details with RSPH to register you as a candidate. You will then receive a candidate confirmation email and a system check email from RSPH.

As MHFA England is an approved RSPH Centre, your personal information will be protected in line with RSPH's privacy policy. You can find out more about the privacy and security of your personal information processed by the RSPH [here](#).

## Trustpilot

We may contact you via email to invite you to review any services and/or products you received. To assist us we use an independent third-party review service platform called Trustpilot to collect feedback. This means that we will share your name and email address with Trustpilot for this purpose. Trustpilot will not use your personal details for any other purpose other than assisting us with the collection of reviews. If you want to read more about how Trustpilot process your data, you can find their

Privacy Policy [here](#). We may also use such reviews in other promotional material and media for our advertising and promotional purposes.

### **Other third-party service providers working on our behalf**

We may share 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 support our IT infrastructure and provide cloud hosting services). When we use third party service providers, we will only disclose the personal information that is necessary to deliver that service.

Please be reassured that we will not release your information to third parties for them to use for their own purposes, unless you have consented 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.

We may transfer your personal information to a third party as part of a sale of some or all our business and assets to any third party or as part of any business restructuring or reorganization, or if we're under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

### **International data transfers**

As part of the products and services offered to you, the information which you provide to us will not be transferred to countries outside of the European Economic Area (EEA) or transferred to a non-EEA Country whose privacy legislation does not ensure an adequate level of protection as specified under UK GDPR. The Microsoft servers which are used to store our data are located within the EEA.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA to provide you with those services.

## What are your rights?

Under data protection laws you have a number of rights in relation to the information that we hold about you, including:

- The right to access information we hold about you and information about what we do with it. This must be clear, transparent, and easily understandable information about how we use your personal data and your rights.
- In some circumstances, the right to withdraw your consent to our processing of your information. We may continue to process your information if we have another legitimate reason for doing so.
- In some circumstances, the right to receive certain information you have provided to us in an electronic format and/or ask that we send it to a third-party.
- The right to ask that we rectify your information if it's inaccurate or incomplete.
- In some circumstances, the right to ask that we delete your information. We may continue to keep your information if we're entitled or required to retain it.
- The right to object to, and to ask that we limit our processing of your information in some circumstances. Again, there may be situations where you object to, or ask us to limit our processing of your information but we're entitled to continue and/or to refuse that request.

You have a choice about whether you wish to receive direct marketing from us. If you do not want to receive direct marketing communications, then you can select your choices by not ticking the relevant boxes situated on the form on which we collect your information. You can also opt-out of marketing communications by clicking on the "unsubscribe" link provided in each email you might receive.

We will not contact you for direct marketing purposes by email, phone, post, or text message unless you have given your prior consent. We may contact you in the first instance to ask for your marketing preferences if your information has been collected indirectly from other legitimate sources.

The accuracy of your information is important to us 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 contact us by email at [info@mhfaengland.org](mailto:info@mhfaengland.org) or telephone on **0203 928 0760**.

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 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 several requests, in this case we will notify you.

## **How do we protect your personal data?**

We take the security of your personal information very seriously. We use a combination of technical, organisational, and physical security measures to protect your personal information in line with our obligations under data protection law.

We require our staff, and any third parties who carry out any work for us, to comply with appropriate compliance standards and regulations. We allow access to your personal data only to those employees and partners who have a business need to know such data. Our employees receive mandatory training to help us comply with data protection laws and help safeguard your privacy by handling your personal information with the appropriate due care.

In the event of an information security incident or breach, we have handling and reporting procedures in place and will notify you and any applicable regulator if we are legally required to do so.

Personal information (for example, your email address) are transmitted normally over the internet and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we will make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

## How long do we keep your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including the purpose 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.

For tax purposes the law requires us to keep basic information about our customers (including contact, identity, financial and transaction Data) for six years after they stop being customers.

Where possible, we will seek to anonymise personal information so that it can no longer be associated with the individual, in which case we may use this information indefinitely without further notice to you.

## Right to complain

We are committed to working with you to settle any complaint or concern you may have regarding your data privacy. If you have any queries or concerns, please contact us at [dataprivacy@mhfaengland.org](mailto:dataprivacy@mhfaengland.org).

If you remain dissatisfied, you can make a complaint about the way we process your personal information to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. You can contact the ICO directly Online or call their helpline on **0303 123 1113**.

The ICO will expect you to have first raised your concerns with the organisation before submitting a complaint.

## Contact us

If you have any concerns regarding this Privacy Notice, our privacy practices, or for any other general enquiries, you can send an email to [info@mhfaengland.org](mailto:info@mhfaengland.org) or write to us at **21 Prescot Street, London, E1 8BB**. Alternatively, you can telephone **0203 928 0760**.

## Changes to our Privacy Notice

As our business and technology evolves, we might need to change this Privacy Notice. We encourage you to regularly review this Privacy Notice to make sure you are up to date with how MHFA England is processing your personal data.

In addition to this Privacy Notice, there may be specific campaigns or promotions which will be governed by additional privacy terms or notices. We encourage you to read these additional terms or notices before participating in any such campaigns or promotions, as you will be required to comply with them if you choose to participate.