



## **PRIVACY POLICY**

This policy describes how and why Arts and Minds processes and uses personal information, and how we protect the privacy of all individuals regardless of how the information is stored (paper, electronically, etc.).

### **Who We Are**

In this Privacy Policy, 'Arts and Minds', 'we', 'us' or 'our' means: Cambridgeshire and Peterborough Foundation for the Arts and Mental Health (registered charity in England and Wales number 1122845, and registered company number 06339920). Our principal place of business is: Cambridge Junction, Clifton Way, Cambridge, CB1 7GX.

You can contact us by phone on 01223 403285, or by email at [admin@artsandminds.org.uk](mailto:admin@artsandminds.org.uk).

If you have questions regarding this privacy policy, including any requests to exercise your legal rights, please contact us using any of the methods listed above.

### **How we collection information**

We collect information in the following ways:

- Information provided to us directly by you if you enquire about our programmes, become a participant on one of our programmes, sign up for one of our events (e.g. Creative Cafe), sign up to our newsletter, make a donation, register as a volunteer, artist, counsellor, facilitator, ambassador or trustee, or communicate with us for any other purpose.
- Information provided to us directly by your GP if you are referred by them to one of our activities (e.g. Arts on Prescription)
- Information provided to us by a third party if a friend or family member signs you up for one of our events.
- Information from social media if you engage with us on any of our platforms, which are subject to the terms and conditions, and the privacy policies of each respective platform.
- Information from our website. When you use our website, we collect information on how you used our website through "cookies". You can find out more about how we use cookies in our Cookie Policy.



## What information we collect

The type of information we collect differs depending on where and when it is collected, and includes:

- Name
- Date of birth (for trustees only)
- Contact details
- Referrer details
- Emergency contact details
- Photo permission
- Mailing list permission
- Gender
- Payment details when you donate
- Information relating to your health
- Information as to whether you are a taxpayer for Gift Aid purposes
- Personal characteristics information for monitoring purposes
- If you volunteer for us or apply for a job with us (including trusteeship), information necessary to processing your application such as your employment history, DBS check if appointed
- Information about your activities on our websites, including the type of device you use to access these and your geographical location
- 'Special category data', which is personal data that requires more protection because it is sensitive.
  - This type of data is defined in the GDPR as data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data (when used for identification purposes), health, sex life or sexual orientation.
  - We will only collect special category data when there is a clear reason for doing so, such as collecting information on your health when you access our services so we can provide appropriate support. We will also collect this data if you make it public or volunteer it to us.

## How we use the information we collect

We will use your personal information to:

- Provide you with services or information you have requested or been referred for
- Process donations you have made
- Respond to any requests you have made



- Manage and develop our events and services
- Maintain a record of attendance
- Keep you notified of upcoming events, if you have given us express permission to do so
- Send you our newsletter
- Correspond in any other way with you, where necessary and appropriate
- Further our charitable objectives
- Administer our website, including the generation of statistics through data analysis, research and surveys
- Create reports on our work and services (at an aggregated level)
- Safeguard our staff and volunteers
- Process your application if you apply to be a volunteer or employee of Arts and Minds
- Audit and administer our accounts
- Meet our legal obligations
- Establish, defend or enforce legal claims

We will only use your personal information where there is a lawful basis to do so. Under the GDPR, the lawful bases we rely on for processing this information are:

- **Your consent**  
Your consent must be explicit. You can remove your consent at any time by contacting us via post, email or phone - details are at the start of this policy
- **We have a contractual obligation**  
This is when we need to process your data to deliver a service you have requested or have been referred for, or if we need to process your information in order to make steps towards a contractual obligation
- **We have a legal obligation**  
This is when we need to process your personal information to comply with common law or statutory obligations, and we will only process your personal information for this purpose when absolutely necessary
- **We have a vital interest**  
This is when we need to process personal information to protect someone's life
- **We need it to perform a public task**  
This is when we have to carry out a task in the public interest that is laid down by law, or exercising official authority that is laid down by law



- **We have a legitimate interest**

This refers to the day-to-day activities of Arts and Minds that requires the processing of personal information, such as the monitoring of our website, keeping an internal record of our volunteers, employees and service users, sharing of information between our teams that provide you with services you have requested or have been referred to, etc.

This basis will only be used where we can identify a legitimate interest, can be certain that processing your personal data is necessary to achieve it, and is balanced against your individual interests, rights and freedoms.

We will only use your personal information for the purposes for which we collected it, unless another reason is considered to be compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you.

### **Sharing data with Third Parties**

We will never sell, rent or exchange your details with any other organisation outside Arts and Minds. We will ask for your consent to share personal information.

Examples of when we need to share personal information:

- If we have a concern about your personal health, we will contact your emergency contact
- If we have a concern about your mental health, we may contact your emergency contact and / or GP or other healthcare professional (as provided on your participant agreement)
- For any other safeguarding concerns, as detailed in our Safeguarding Policy
- Where required to do so, including but not limited to: 'know your donor' enquiries, a court order, regulation, or requests from the police, a regulatory authority or government authority

### **How we keep your personal information safe**

We ensure that any technical or organisational controls (including password protection, secure physical filing, access control and managerial measures) are in place to protect your personal details. We also ensure we keep an external backup that is updated every month.



## How long it is kept for

The length of time we keep personal information for depends on its type and purpose, including in circumstances where any legal, accounting, reporting or regulatory requirements may apply. Generally we follow the below timelines, but if you would like more information, please contact us.

- Personal information (including contact details) for those who have accessed our services: three years.
- HR/Personnel records (including safeguarding reports): five years.
- Information required for financial records: seven years.

## How often do you review personal information?

We review our programme/participant data at the start and end of each programme, and conduct a general review of all data every six months.

## How we securely destroy it

When the data retention period has ended or when we are able to action an erasure request, we will ensure that any digital and/or physical copies of that data are destroyed by deletion (including from any back up systems) and secure shredding.

## Your rights

Under data protection law, you have rights over the personal information we hold about you:

- **The right to be informed**
- **The right of access**

This is where you have the right to access and receive copies of the personal information we hold about you, and is commonly referred to as a 'subject access request'. Unless legal restrictions apply, we will provide you with this information if you contact us via any of the method laid out at the start of this policy
- **The right to rectification**

This is where you can make a request for us to rectify inaccurate personal data or complete incomplete personal data
- **The right to erasure**

This is also known as 'the right to be forgotten', and you can make a request for us to erase any personal information we hold about you



- **The right to restrict processing**

This is where you can request the restriction or suppression of your personal data and applies when there is a contestation of the accuracy of your data, you need us to keep it for a legal claim, we are not lawfully allowed to use it, or believe your privacy rights outweigh our legitimate interests to use your information for a particular purpose.

- **The right to data portability**

This allow you to obtain and reuse any personal data we hold about you for your own purposes, and allows you to move, copy or transfer personal data easily in a safe and secure way

- **The right to object**

This where you can object to the processing of your personal data in certain circumstances, such as when your personal data is used for direct marketing purposes (of which your right to object is absolute), a task carried out in the public interest, the exercise of official authority vested in us, or our legitimate interests (of which your right to object is not absolute)

If you wish to exercise any of the above rights, please contact us. No charge is required. We may need to ask for further information or evidence of identity to complete the request, and we aim to respond fully to all requests within one month of the receipt of your request.

## **Complaints**

If you have any concerns about our use of your personal information, you can contact us using any of the methods outlined at the start of this policy.

You also have the right to lodge a complaint about any use of your information with the Information Commissioner's Office, the UK data protection regulator:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline telephone number: 0303 123 1113  
ICO website: [www.ico.org.uk](http://www.ico.org.uk)