



# PRIVACY POLICY

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## 1. Introduction

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Welcome Back to Work is committed to protecting the privacy and security of your personal information. We take care to protect the privacy of users of our service when they are with us (online or offline),,at events, over the phone, through our website and social media platforms.

We have therefore developed this privacy policy to inform you of the data we collect, what we do with your information, what we do to keep it secure as well as the rights and choices you have over your personal information.

Throughout this document we refer to Data Protection Legislation which means the Data Protection Act 2018 which incorporates the General Data Protection Regulation (GDPR), the Privacy and Electronic Communications (EC Directive) Regulations 2003 and any legislation implemented in connection with the General Data Protection Regulation which is the governing legislation that regulates data protection across the EEA. This includes any replacement legislation coming into effect from time to time.

## 2. The information we collect and when

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We only collect information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of information that we will collect on you, and you voluntarily provide to us through the Welcome Back to Work service includes:

- Your name
- Address
- Telephone number(s)
- Email address
- Survey responses
- IP address

We may, in further dealings with you, extend this information to include your, records of conversations, qualifications or registrations with governing bodies to enable us to help you return to work. You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to deal with you as a service user in an efficient and effective manner.

- The legal basis for processing your data is based on your specific consent that we will have requested at the point the information was initially provided, therefore we will not store, process or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so.



### 3. How we use your information

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- To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about;
- Make available our services to you;
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- For statistical analysis and to get feedback from you about the services that we offer. For example, occasionally we may invite you to write a review or testimonial for use to publish for marketing purposes.
- To power our security measures and services so you can safely access our website and mobile apps;
- Help us understand more about you as an individual to enable us to navigate you through getting back to work
- Contact you about events, or additional things we can do to help you in the future
- Contact you about signposting other services we think might be of benefit to you
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- Help answer your questions and solve any issues you have.

### 4. Who we might share your information with

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We may share your personal data with other organisations such as, NHSE, Host GP practices, but this will always be with your consent.

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud); or
- From time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. However, all the information we share will be collected and anonymised, so neither you nor any of your devices can be identified from it.



## 5. How we keep you updated on our products and services

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We will contact you by email with information about sessions, support groups and other events we have to offer. We will only do this if you have previously consented to receive these emails. You can change your marketing choices in writing to us at any time.

## 6. Your rights over your information

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### **6.1.1. Right to Access Your Personal Information**

You have the right to access the personal information that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal information to you (or someone else on your behalf), we will provide it to you or them free of charge and aim to do so within 30 days from when your identity has been confirmed.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal information.

If you would like to exercise this right, please contact us as set out below.

### **6.1.2. Right to Correction Your Personal Information**

If any of the personal information we hold about you is inaccurate or out of date, you may ask us to correct it.

If you would like to exercise this right, please contact us as set out below.

### **6.1.3. Right to Stop or Limit Our Processing of Your Data**

You have the right to object to us processing your personal information if we are not entitled to use it any more, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

### **6.1.4. For more information about your privacy rights**

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access them here <https://ico.org.uk/for-the-public>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.



## 7. How long we keep your information for

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We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. Unless otherwise required by law, your data will be stored for a period of 2 years after our last contact with you, at which point it will be deleted.

## 8. Giving your reviews and sharing your thoughts

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When using our website you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## 9. Security

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Data security is of great importance to the Welcome Back to Work project and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

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- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores.
- Never asking you for your passwords;
- Advising you never to enter your account number or password into an email or after following a link from an email.
- Any paper documents with details on are kept locked away and only accessible by the Data Controller



## 10. How to contact us

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If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: [paflack@outlook.com](mailto:paflack@outlook.com) or [lucy@silovsky.co.uk](mailto:lucy@silovsky.co.uk)

Thank you for taking the time to read our Privacy Policy.

Welcome Back to Work Service

This Policy was last updated on May 2020