

1. Introduction

- 1.1 Camphill Wellbeing Trust (CWT) is committed to protecting your personal information and being transparent about the information we hold.
- 1.2 This privacy notice describes how CWT collect and use your personal information while we provide services to you and afterwards, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- 1.3 We may update this notice at any time. If we do so, we will post the changes on this page and they will apply from the time we post them.
- 1.4 In line with the principles defined in the Data Protection Act 2018 and the UK General Data Protection Regulation, CWT will ensure that personal data will be processed in ways that are:
 - Lawful, fair and transparent
 - Collected for specific explicit and legitimate purposes
 - Adequate, relevant and limited
 - Accurate and up-to-date
 - Not kept for longer than necessary
 - Secure

2. Who We Are

- 2.1 Camphill Wellbeing Trust is a registered name of Camphill Medical Practice Ltd, a Scottish charity SC016291 and a limited company registered in Scotland SC120539 with registered office: St John's, Murtle Estate, Bieldside, Aberdeen, AB15 9EP.
- 2.2 'We', 'us' and 'our' refers to Camphill Wellbeing Trust [CWT] and its projects, including the Blue Door charity shop and the Compass Project. All projects are controlled by CWT and staff are CWT employees, contracted staff and volunteers.

- 2.3 We are registered with the Information Commissioner's Office as a Data Controller under registration reference ZA418153 for all of our activities. As a data controller we are responsible for deciding how we hold and use personal information about you. We are legally required to notify you of the information contained in this privacy notice. This notice does not form part of any contract you may have with us.

Your acceptance of this notice and our right to change it

- 2.4 When using our websites, social media pages, services (including phone and email) or providing your information to us, we will collect and use your information in the way(s) set out in this privacy notice. If you do not agree with this, please do not use our sites, social media pages or services.
- 2.5 This notice applies to all the websites we operate:

- www.camphillwellbeing.org.uk
- www.mistletoetherapy.org.uk
- www.compassaberdeen.org.uk

as well as our use of emails and any other methods we use for collecting information.

3. What is personal data?

- 3.1 Personal data is any information about you from which you can be identified, for example name, address, phone number or email address.
- 3.2 There are also categories of personal data that are more sensitive, and known as special category data. For example: your health information, ethnicity, sexual orientation.
- 3.3 Non-personal data is data that can't identify you personally, but can provide us with information to improve our services

4. How we collect your information

4.1 Directly from you

For example, you may give us personal information when you:

- Sign up to attend one of our events e.g. fundraising, informational, educational
- Support one of our fundraising events
- Make a donation or fundraise for us
- Request information from us
- Contact us by letter, phone, email or via our website
- Follow our Facebook pages
- Choose to share your story with us e.g. for our newsletter or website
- Take part in surveys, questionnaires or get involved with our campaigns
- Request to use our service provision
- Sign up to our e-newsletter or ask to be included in our mailing list
- Visit our websites
- Enter our Blue Door Charity Shop/North Point Hall: your image is recorded via CCTV cameras
- Enter certain areas of our Compass site: your image is recorded via CCTV cameras
- Volunteer with us or apply to work with us
- Are contracted to provide services for CWT
- Contact us or become involved with us in any other way not listed above.

4.2 From third parties

We may receive information about you from other people or organisations (third parties) if you have given them permission to share this information. For example:

- you have been referred to us from your GP, Consultant or other health professional
- where a family member or friend contacts us on your behalf
- you set up a fundraising page for us, or donate, through LocalGiving
- you sign up to a challenge or enter an independently organised event like the Edinburgh Marathon in order to raise money for us
- you have been named as the Executor on a Will, we may receive your details in order to administer a Gift left to us in that Will
- where you have given referee details in your job application

4.3 Online

From our website

- **Through cookies:** Our websites, like many websites, use cookies. A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies can do a number of things, e.g. remembering your preferences, counting the number of people looking at a website. Our websites do not use cookies that collect personal information.

We use Automattic's Jetpack software to collect and analyse the information provided by cookies so we can understand how our website is used, assess the popularity of information provided to users and to make improvements. The information collected through Jetpack is not personally identifiable. Automattic's privacy policy is available at <https://automattic.com/privacy/>

It may be possible to switch off your browser's cookie preferences. However doing so may reduce the functionality of our websites.

- **Through website contact forms:** when you contact us using our online form, the information is passed directly to CWT. The form does not send any data to third parties.

From Facebook / Social Media

By following a CWT social media page, you consent to the social media's sites own terms and conditions. We do not collect data from the page's followers.

Through Mailchimp

We use the online mailing platform, Mailchimp, to process the information you give when you sign up to receive our newsletter. Mailchimp's privacy policy is available here: <https://mailchimp.com/legal/privacy/>

4.4 When you make a purchase or donate

- When you use your credit or debit card to make a purchase at the Blue Door Charity Shop, your card details are not stored by CWT following the completion of your transaction. You can read the card machine provider's privacy policy here: <https://www.tylbynatwest.com/merchant-privacy-notice>
- When you use your credit or debit card to make a purchase at CWT or the Compass Project, your card details are not stored by CWT following the completion of your transaction. You can read the card reader provider's privacy policy here: <https://www.zettle.com/gb/legal/privacy-policy>
- All donations completed online are handled securely by LocalGiving and we do not receive your card details. We receive your contact information and message where you have provided this.

5. Personal data that we process

The personal information we process about you will depend on your relationship with us. The following table explains the types of data we collect and our legal basis under current data protection legislation for processing this.

Who	Purpose	Data (key elements)	Basis
Website users	Website functionality	Website activity, collected through cookies	Legitimate interests
Enquirers	Enquiring about our organisation and its work / services	Name, contact details, message	Legitimate interests Contract
Subscribers / Supporters	Sign up to receive CWT updates & newsletter	Name, contact details	Consent Legitimate interest
Donors	Supporting the charity with a donation	Name, contact details	Legal obligation Legitimate interest
Fundraisers	Supporting the charity through fundraising	Name, contact details	Legal obligation Legitimate interest
Event attendees	Event management and provision of follow-up information	Name, contact details, relevant health information e.g. allergies, feedback forms	Legitimate interests Consent Vital interests
Visiting professionals	Management of visit	Name, contact details, professional details	Consent Contract Legitimate interests
Service users & their families	Provision of information and services Management obligations Service audits	Name, contact details, personal information including medical details, lifestyle and social information, photograph	Contract Consent Vital interests Legitimate interests Provision of health care or social care (Article 9 2(h))
Customers: Blue Door Charity Shop	Security	CCTV images	Legitimate interest
Public accessing certain areas of Compass site	security	CCTV images	Legitimate interest
Customers: other	Completion of transaction & provision of other relevant information	Name, contact details, bank details	Contract Legal obligation Legitimate interest
Volunteers	Contractual, statutory and management obligations	Name, contact details, relevant medical information, emergency contact details	Contract Legal obligation Vital interests Assessment of working capacity (Article 9 2(h))
Job Applicants	Administration of application	Application form including referee details	Legitimate interests
Staff	Contractual, statutory and management obligations	Full personnel record including application form, appraisals, medical information, emergency contact details, disclosure number, absence records, disciplinary & grievance records	Contract Legal obligation Vital interests Purposes of preventive or occupational medicine and assessment of working capacity (Article 9 2(h))
Associate Therapists	Contractual, statutory and management obligations	Name, contact details, banking details (disclosure number, where relevant)	Contract Legitimate interest Legal obligation
Contractors and Suppliers	Contractual, statutory and management obligations	Name, contact details, banking details (disclosure number, where relevant)	Contract Legitimate interest Legal obligation
Directors	Appointment and registration with Companies House	Name, contact details, ID documentation, CV	Legal obligation Legitimate interest

Under 16s

We are committed to protecting the privacy of the young people who engage with us. If you are under 16 and would like to get involved, please ensure you have consent from a parent or guardian before you provide your personal information to us. We do not send any marketing communications direct to children under 16.

6. How we use your personal information

6.1 We will only use your personal information for the purposes for which we collected it (as outlined in the table above) and for reasons that are compatible with that purpose. For example:

- to provide you with the information, services or products you asked for
- to administer your participation in an event
- to keep a record of your relationship with us e.g. feedback about our services including complaints
- to keep you up-to-date with the impact of your support
- to provide information relating to our services / products where you have given express permission (by email or post) or where we have a legitimate interest to do so (postal only)
- for promotional purposes e.g. if you have shared your story or given us consent to use your photo
- to protect your interests or someone else's interests
- to administer your donation or support your fundraising, including submitting your details to HMRC to claim Gift Aid if applicable
- to ask for financial and non-financial support
- to manage our grants
- to fulfil our contractual obligations
- to process a job or volunteering application
- to comply with a legal obligation
- for internal record keeping
- for audit and research purposes
- to improve our services
- where it is needed in the public interest or for official purposes
- for the prevention or detection of crime

7. When we share your personal information

- 7.1 Where necessary, we may share your data with appropriate third parties including other professionals involved in our work.
- 7.2 We will only pass your data to third parties in the following circumstances:
 - you have provided your explicit consent for us to do so
 - it is in your vital interests for us to do so
 - we are using a third party for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party
 - we are required by law to share your data.
- 7.3 We do not allow our third-party service providers to use your personal data for their own purposes.
- 7.4 We require third parties to respect the security of your data and to treat it in accordance with the law.
- 7.5 We do not pass data to third parties outside of the UK without your consent.
- 7.6 We do not share your personal data with any third parties including charities for their marketing or commercial purposes.

8. Processing your data securely

- 8.1 We have put in place appropriate, and proportionate, security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.
- 8.2 We limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 8.3 All paper records are stored on premises at our offices. These offices are securely locked when no members of staff are present and access is restricted and monitored during the working day.
- 8.4 CWT holds its email list on a secure database within Mailchimp and its computer data on secure cloud storage which is hosted in the UK in compliance with the UK GDPR. Access to these systems is limited to CWT staff and its contracted IT company and there is restricted access to data based on a person's role in the organisation.

- 8.5 When you use our fundraising platform, LocalGiving, your data is stored according to its policies. You can read their Privacy Policy here:
<https://localgiving.org/legal/privacy-policy>
- 8.6 When you sign up to our e-newsletter mailing list, the contact information you supply will be stored by MailChimp. You can read Mailchimp's privacy policy here:
<https://mailchimp.com/legal/privacy/>
- 8.7 When you use our card machine in the Blue Door, your data is stored according to its provider's policies. You can read their Privacy Policy here:
<https://www.tylbynatwest.com/merchant-privacy-notice>
- 8.8 When you use our card reader or Zettle link from CWT or at the Compass Project, your data is stored according to its provider's policies. You can read their Privacy Policy here: <https://www.zettle.com/gb/legal/privacy-policy>
- 8.9 Our websites use SSL technology (secure server software) to help keep your personal information secure.
- 8.10 CWT have procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of this where we are legally required to do so.

9. How long we keep your data

- 9.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, audit or reporting requirements.
- 9.2 We hold your personal information for as long as required to provide you with the information or services you have requested, to administer your relationship with us, to inform our research into mistletoe therapy and AnthroHealth services, to record our supporters' preferences or to ensure we do not communicate with people who no longer wish to hear from us.
- 9.3 Further details about our Retention Policy and Schedule are available on request.

10. Your rights

- 10.1 Under certain circumstances (see ICO website: <https://ico.org.uk>) by law you have the right to:
- request access to your personal information and to receive a copy of it.
 - request correction of the personal information that we hold about you.
 - request erasure of your personal information where there is no good reason for us continuing to process it.
 - object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
 - request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
 - request the transfer of your personal information to another party.
- 10.2 Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for direct marketing purposes or to be unsubscribed from our email list at any time.
- 10.3 If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us. You will not have to pay a fee to exercise your rights. However, we may charge a reasonable fee or refuse to comply with your request if your request for access is clearly unfounded or excessive.

11. Contact Us

If you have any questions about this privacy notice, please contact our Data Protection Officer:

CWT COO
St Devenick's
Murtle Estate
Bieldside, Aberdeen
AB15 9EN

Phone: 01224 862008
Email: admin@cwt.scot

Expressing a concern

If you are not happy about the way in which CWT has processed your data, please get in touch with us in the first instance. You also have the right to complain about how we use your personal information to the Information Commissioner's Office ("ICO").

For further information on how to exercise this right, please see the guidance from the ICO by contacting them on: 0303 123 1113 or visiting their website:

<https://ico.org.uk/make-a-complaint/>