

At MindTune we take the privacy and safety of our users very seriously. This document is to tell you:

- about how we protect your personal data,
- how we work to keep you safe.

WHAT IS DATA PROTECTION

There is a law called the Data Protection Law which is in place to ensure that we protect your personal data and only use it lawfully, in accordance with that law.

MindTune is known as a data controller, our registered office is at 12 Sutherland Drive, Lowestoft, Suffolk, NR32 4LP (Telephone: 07736 939387, Email: info@mindtune.co.uk). Our Data Protection Officer is Sarah Clark, who is also one of the founders of the business and is a Senior Partner. Sarah ensures that we follow the regulations on data protection and GDPR.

If you wish to contact us and you are a Service User, please do this by logging in and sending a private message to our staff in order to protect your anonymity.

WHAT INFORMATION DO WE NEED TO COLLECT AND WHY?

When you book an appointment with MindTune we need to collect some personal information from you - this is known as Personal Data. When you become one of our clients, MindTune asks for:

- Your name and address
- Your date of birth
- Contact details such as email address and telephone number
- Any other organisations that you may be working with

We need this data to be able to provide a service to you. Our legal basis for processing this data is to deliver a contractual service to you.

We may also collect additional data, which is called 'special category data' including age, gender and medical history. This information helps us to improve our services to you and the wider community.

This data is collected under the legal basis 'legitimate interest' as it helps us to measure how we are performing as a service and to improve our service.

THE USE OF COOKIES ON MINDTUNE

Cookies help us to provide you with a good experience when you use our website and when you use our booking form to register.

We use cookies on our website for two purposes. We collect information about how you use MindTune, such as browser usage, so that we can improve the way the site works, including adding new features and fixing bugs and issues. We also collect key site interactions so that we can ensure at risk users are safeguarded effectively. However, we do not collect any information to allow MindTune user accounts to be linked to you outside of MindTune, unless you intentionally disclose that information as part of your work with a MindTune practitioner.

If you do not wish to have information gathered about your usage, please choose the 'Use Necessary Cookies Only' option on the cookie consent banner.

COOKIES ON MINDTUNE

MindTune collects cookies about how our users engage with our website.

We store a cookie in your browser that remembers the choice you made about the use of Analytics or Marketing cookies. This is a necessary cookie and will not be used for any gathering of information.

We use Analytics cookies to enable us to use tools to gather anonymous data about how you use MindTune in order to better improve the user experience for all of our users.

We use Marketing cookies to enable us to use tools to gather anonymous data about how you found out about MindTune in order to better understand how to reach more users.

REFERRALS TO MINDTUNE FROM EXTERNAL SERVICES OR FROM A THIRD PARTY

Sometimes, people are referred into our service by a third party, such as your GP, or another service you may have been working with.

If you have been referred to MindTune by someone and they have shared your Personal data with us, we will keep your personal details in a confidential section of your account that can only be seen by MindTune team members. This information would only be used in situations described in the Safeguarding section below.

WHAT OTHER PERSONAL DATA DO WE HOLD?

Depending on how you interact with us, you may at times give us some personal information which we have not asked for.

Any personal data which you provide to us will be securely stored against your profile within our platform. If you do decide to give us your personal data, it may mean you are no longer 'anonymous' to us, for example, we may know who you are or where you are.

DO WE SHARE YOUR PERSONAL DATA WITH ANYONE ELSE?

Safeguarding

We have a Duty of Care to safeguard your wellbeing.

If we are really worried about you and think that you are at risk or danger, we will talk to you about the need for somebody outside the MindTune team to know what has happened or what is happening to you.

We would only do this if:

- your life is at risk because of something you are doing,
- you are at risk from somebody else,
- you are a risk to somebody else.

In these cases, our therapists and counsellors will ask you to consent to share your details so that they can refer you to the appropriate services or get the help you need. If you do not consent and our team feels it is a safeguarding issue, then they may refer/share any details which we have.

In this case, we will:

- Let you know who we are passing details to and why,
- Keep you informed of any actions we intend to take,
- Where possible, we will work with you to agree every step taken.

Sometimes, if the situation is very serious, we may have to take action without talking to you first.

In the event of a safeguarding concern please contact either Sarah Clark or Claire Jarvis, as they are the designated safeguarding leads for MindTune. Their contact details are sarah@mindtune.co.uk and claire@mindtune.co.uk.

REFERRAL FROM MINDTUNE TO EXTERNAL SERVICES

Sometimes getting extra help for you can be really helpful. Depending on where you live you may be given the option of a referral to another service in your area. These services may be operated by MindTune or a partner organisation.

If you self-refer, you could provide personal details directly to the organisation. If you wish the MindTune team to make a referral on your behalf you would need to share personal data which we would need to pass on to enable us to complete the referral. This personal data will be stored on the MindTune system and is only accessible to the MindTune Team and the organisation you are being referred to.

We will always seek your consent to pass over your details and let you know who we are passing details to.

WHERE DO WE KEEP YOUR DATA AND HOW LONG FOR?

All information is stored securely within MindTune's clinical platform and is only accessible to the MindTune Team. Our systems are encrypted (coded which ensures your data is protected). MindTune uses the Google Cloud Platform's europe-west-2 region for hosting (London, UK). MindTune data is hosted in the europe-west-2 region (London) of the Google Cloud Platform.

We only keep your personal data for as long as necessary to provide our services to you and also to ensure we meet our legal obligations. We will keep your personal data for 7 years after you have stopped using our service. In some cases we may need to keep it for longer, if we legally have to.

YOUR DATA - YOUR RIGHTS

As the owner (aka 'Data Subject') of your personal data, you have certain rights under the General Data Protection Regulations (GDPR) to find out about our use of your personal data.

You have:

- The Right to be informed - by providing you with this document, we are giving you the information about your data that is collected and held by us,
- The Right of access - you can ask about your personal data that we hold - this is called a "data subject access request",
- The Right to rectification - you can tell us if the data we hold is wrong or incomplete and ask us to put it right,
- The Right to erasure - you can request erasure of your personal data. This enables you to ask* us to delete or stop processing your data. (*There may be times when we can't do this though because we are required by law to hold it for a certain time),
- The Right to restrict processing - you can object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing,
- The Right to data portability - you can ask us to securely transfer your personal data to another data controller,
- The Right to object - you can ask us to stop the processing of your personal data for a period of time if data is inaccurate or there is a dispute about its accuracy or the reason for processing it.

If you wish to do any of these things, message a member of the MindTune team and they will help you.

If you think that we have failed to handle your data properly or have not allowed your rights listed above, you have the right to make a complaint to the Information Commissioner's Office.

YOUR RIGHT TO WITHDRAW YOUR CONSENT

You have the right to withdraw consent if you have shared any personal data with us. You can withdraw your consent to share information at any time. You can request to withdraw your consent by sending a message to the MindTune team.

ADDITIONAL INFORMATION ON HOW WE IMPROVE OUR SERVICES

We may use the data we collect to measure how we are performing as a service and to improve our service. This information is always anonymised, therefore it could not be used to identify you.

CASE STUDIES

We are sometimes asked by the organisations who use our service, to provide them with anonymous monthly case studies of our work with service users. This is so they can see how well MindTune is performing in our role in supporting you.

Our team at MindTune also have to take part in ongoing training and development so that they can be best placed and trained to support you. This means that they sometimes also have to write case studies for their courses or training.

Whenever a case study is written, we never use any of your personal data. It will never be possible to identify you from these case studies.

RESEARCH

For MindTune to be able to improve its services, we sometimes work with trusted partners, including universities and NHS organisations to help us analyse our data.

This includes working with researchers from universities who get ethical approval for their work.

The data which we provide to them is a mixture of statistics and information that you have provided to us.

The statistics include data such as the age, ethnicity, and gender of service users as well as other information provided to the service such as goals or assessments, and service usage data. Other information includes both public and private information shared within MindTune. Public information refers to any article and discussion board submissions as well as comments which are approved by our moderation team and posted on the site for other users to see. Private information refers to any communication you have with the counselling team either through chat (one-to-one messaging) or messaging the team inbox.

It does not contain any personal data which could be used to identify you - it is completely anonymised. No identifiable information will ever be shared outside of our organisation for research purposes without your explicit consent.

If you want to find out more information about how we use data for research, you can message the team through the platform.