



Privacy Notice

Wellbeing Enterprises

1. Introduction

This Privacy Notice explains in detail the type of personal data we may collect about you when you interact with us or access our services. It also explains how we will store and process that data and how we will keep it safe.

2. What is Wellbeing Enterprises?

- Wellbeing Enterprises was established in 2005 as the first Wellbeing Community Interest Company in the UK.
- Wellbeing Enterprises is a pioneering leader in the health and wellbeing sector that offers bespoke products and services to improve the health and wellbeing of individuals and communities.
- Wellbeing Enterprises also provide specialist support to health and social care professionals and organisations to enable them to put wellbeing at the core of what they do.
- For simplicity throughout this notice, 'we' and 'us' means Wellbeing Enterprises.

3. Explaining the legal bases we rely on

The UK General Data Protection Regulation 2018 sets out a number of different reasons for which an organisation may collect and process your data. These include:

Public Interest

The UK GDPR permits the processing of data when it is **necessary for the performance of a task carried out in the public interest** and the delivery of care by those who commission our services falls into this category.

Legitimate interest

When we are providing you with services, we will need to process your data to run our business and deliver our services. We will ensure that this does not materially impact your rights, freedom, or interests.

Consent

In specific situations, we can collect and process your data with your consent.

For example, when you tick a box to receive email newsletters.

Special Category Data

As some of the data that we may need to collect in order to provide you with services relates to your health and care, classed as special category data in law, we are required to use that data for purposes related to the delivery and management of care only.

4. When do we collect your personal data?

We collect your personal information in a number of ways:

- Referral form (when an individual first encounters our services)
- Via our website through the booking form system, subscribing to email newsletters, and 'Contact Us' form
- Questionnaires / Intervention Forms when accessing our services
- Via our Welljoy Shop website purchasing/payment form

5. What sort of personal data do we collect?

We collect the following personal information.

- Name
- Gender
- Date of Birth
- Ethnicity
- Employment Status
- Address
- Email
- Telephone Number
- GP Practice
- NHS Number
- Next of Kin
- Health and Wellbeing Questionnaire
- Summary of discussions with persons accessing our services and associated risks
- Summary of reasons for referral and associated risks
- Copies of documents provided by third parties e.g., referral forms
- Information gathered by the use of cookies in your web browser
- Information gathered by Google Analytics
- Credit/debit card information when purchasing via the Welljoy Shop website

6. How and why do we use your personal data?

We collect this information for the following purposes:



- To provide the Wellbeing Services that you require and to enhance, modify, and improve the services we deliver
- To generate and supply anonymised and statistical data to the commissioners who fund us
- To send you email newsletters about our services and important information such as changes to this Privacy Notice.
- To participate in research studies to evidence the benefits our service has on the people and communities it supports. (Your information will not be shared for this purpose without your consent).
- To provide you with a service we work with GP Practices, other health and care teams and a range of community organisations, and we will share information about you with those who can contribute to your care and wellbeing.
- We utilise the services of Google Analytics, a secure and well-regarded service, to analyse data. Information regarding how Google Analytics safeguards your data can be found [here](#). We will only share information with other bodies that are not involved in your care when required or permitted by law e.g., where this is necessary to protect others.

7. How we protect your personal data

- We know how much data security matters to all our clients. With this in mind, we will treat your data with the utmost care and take all appropriate steps to protect it. We regularly monitor our system for vulnerabilities and attacks, penetration testing is carried out to identify ways to further strengthen security.

Our Security measures include:

- We secure access to all transactional areas of our website and apps using 'https' and 'SSL' technology.
- Access to your electronic personal data is two factor authentication. We use secure certificates (SSL) to ensure data is encrypted in transit. The data is stored in a secure SQL Server database with a certified provider. Our system is role based. We only store minimum data for the service.
- Copies of paper based personal information are locked away securely in our filing systems and does not leave the premises
- We secure access to our Welljoy shop website using https and the transmission of sensitive payment information through designated purchase forms protected by SSL / TLS encrypted connection, regularly maintain a PCI DSS (Payment Card Industry Data Security Standards) certification.

8. How long will we keep your personal data for?

- a. Whenever we collect or process your personal data, we will only keep it for as long as is necessary for the purpose for which it was collected.
- b. At the end of that retention period, your data will either be deleted completely or anonymised so that it can be used in a non-identifiable way for statistical analysis and reporting to funders.

Examples of data retention periods:

- c. Employee records are kept for six years following termination of Contract.
- d. Patient/client data is kept for eight years and then becomes anonymised for the purposes mentioned above.
- e. Personal information collected in relation to children is kept until their 25 / 26th birthday depending on when they entered the service.

9. Who do we share your personal data with?

As described above we sometimes share your personal data with trusted third parties in order to ensure that you receive the care that you require. These include bodies that provide care and Google Analytics to better understand the data we collect on all our clients.

When we share your data, we make sure that:

- a. We provide only the information they need to perform their specific services.
- b. They may only use your data for the exact purposes we specify in our contract with them.
- c. We work closely with them to ensure that your privacy is respected and protected at all times.

Sharing your data with third parties for their own purposes:

We will only do this in very specific circumstances, for example:

- d. We may be required to disclose your personal data to the police or other enforcement, regulatory or Government body, upon a valid request to do so.
- e. For fraud management, we may share information about fraudulent or potentially fraudulent activity on our premises or in our systems. This may include sharing data about individuals with law enforcement bodies.

10. Where could your personal data be processed?

The data Wellbeing Enterprises collects is processed and stored exclusively within the United Kingdom.

11. What are your rights over your personal data?

You have the right to request:

- a. Access to the personal data we hold about you, free of charge in most cases.
- b. The correction of your personal data when incorrect, out of date or incomplete.
- c. That we stop any consent-based processing of your personal data after you withdraw that consent.
- d. That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- e. The right to request that all your personal data is erased from our systems. We may not be able to respect a request like this where we hold the only copy of information about the care you have received.

Your right to withdraw consent

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation.

We will then do this unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Checking your identity

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

You can contact us to request to exercise these rights at any time as follows:

- **Telephone;** 01928 589 799
- **Email:** info@wellbeingenterprises.org.uk
- **Address:** Bridgewater House, Old Coach Rd, Runcorn, WA7 1QT



If we choose not to action your above requests, we will explain to you the reasons for our refusal.

12. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any request that you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. You can contact them by calling 0303 123 1113 or go online to www.ico.org.uk/concerns

13. Any questions?

If you have any questions that have not been covered, please contact Lynn Swift who will be pleased to help you:

- **Telephone:** 01928 589 799
- **Address:** Bridgewater House, Old Coach Rd, Runcorn, WA7 1QT