



## **Privacy Notice**

### **Wellbeing Enterprises**

#### **1. Introduction**

Wellbeing Enterprises CIC (“WE”, “we”, “us”) is committed to protecting your personal information and being transparent about how we use it. This Privacy Notice explains what data we collect, how we use it, how we keep it secure, and your rights under data protection law.

We process personal data in accordance with:

- The UK General Data Protection Regulation (UK GDPR) (retained EU law from 1 January 2021)
- The Data Protection Act 2018
- The Common Law Duty of Confidentiality
- The Records Management Code of Practice for Health and Social Care

This notice applies to everyone who engages with our services, visits our website, works with us, or communicates with us.

#### **2. What is Wellbeing Enterprises CIC?**

Wellbeing Enterprises CIC is a Community Interest Company established in 2005 that works to improve the health and wellbeing of individuals and communities.

We provide health and wellbeing services. These include programmes delivered in community and healthcare settings, such as social prescribing and other support that help people improve their physical, mental and social wellbeing.

Our services are delivered in partnership with GP practices, NHS organisations, local authorities, voluntary organisations and other community partners.

As part of delivering these services we may collect and process personal information about people who engage with our support.

#### **3. What Personal Data We Collect**

We collect and process different types of information depending on your relationship with us.



If you are a member of the public using our services, only the information in Section 3.1 applies to you. Sections 3.2 and 3.3 apply only to staff, volunteers, job applicants and website users.

### **3.1 People engaging with our services**

We may collect:

- Name
- Address
- Telephone number and email address
- Date of birth
- Gender
- Ethnicity (where provided)
- Employment status
- NHS number (where provided)
- GP practice details
- Next of kin / emergency contact information
- Referral information
- Notes from appointments, assessments, or support sessions
- Health, wellbeing and lifestyle information
- Risk information and safeguarding concerns
- Copies of documents provided by third parties (e.g., referral forms)
- Information collected during questionnaires and intervention forms

### **3.2 Staff, volunteers and applicants**

We may collect:

- Contact and identification details
- Employment history
- Qualifications and training records
- DBS information
- HR, payroll and pension information
- Performance and supervision records
- Emergency contact details

### **3.3 Website and digital services**

We may collect:

- IP address
- Cookie and analytics data
- Device and browser information
- Website usage patterns

### **3.4 When we collect information**



We collect personal data when:

- You complete a referral form to use our services
- You register, book, or submit forms on our website
- You subscribe to newsletters
- You complete questionnaires, assessments, or intervention forms
- You contact us by phone, email or in person
- You purchase items or services through our Welljoy Shop or other online payment systems

#### **4. How We Use Your Information**

We use personal data to:

- Provide health, wellbeing and social support
- Understand your needs and tailor support
- Record goals, progress, outcomes and risks
- Coordinate care with GP practices, NHS and community partners
- Make appropriate referrals (with consent unless a legal exemption applies)
- Contact you about your appointments
- Review, monitor and improve our services
- Produce anonymised statistical reports for funders and commissioners
- Participate in research and evaluations (only with consent or anonymised data)
- Manage staff, volunteers and recruitment
- Meet legal, safeguarding, regulatory and reporting obligations
- Ensure the security and operation of our systems

##### **4.1 Use of anonymised information**

We use anonymised or aggregated information to:

- Evidence impact and outcomes
- Produce reports for commissioners
- Support research and evaluation

We will not use identifiable information for research unless we have your explicit consent.

##### **4.2 Marketing and newsletters**

- We may send optional email newsletters or updates only if you have asked to receive them.
- You can unsubscribe at any time using the link in the email or by contacting us.



## **5. How we use your information and our legal basis for doing so**

We only use your personal information when we have a valid legal reason to do so under the UK General Data Protection Regulation (UK GDPR). The main reasons we rely on are:

### **5.1 Providing our services**

We use your information so we can deliver the wellbeing support, activities and services you have asked for, and to work with the health and care professionals involved in your support.

### **5.2 Running and improving our organisation**

We may use your information to make sure our services are safe, effective and well-managed. This includes monitoring, quality checks and reporting to the organisations that fund our work.

### **5.3 Consent**

In some situations we will ask for your clear consent before using your information, for example:

- sending newsletters or service updates
- taking part in optional research or evaluation
- using testimonials

You can withdraw your consent at any time.

### **5.4 Health and wellbeing information**

Sometimes we need to use information about your health, wellbeing or personal circumstances in order to understand your needs and provide appropriate support.

This type of information is known as special category data under the UK General Data Protection Regulation (UK GDPR).

We process this information where it is necessary to provide wellbeing support, coordinate services with health and community partners, protect individuals from harm, or where the law allows it.

We do not use this type of information for marketing or unrelated purposes.

## **6. Who We Share Your Information With**

We may share your information with:



- Your GP, NHS teams or health professionals
- Referral partners and community organisations involved in your support
- Local authorities, commissioners and funders
- Safeguarding boards and statutory bodies
- IT providers who host or support our systems
- Payment service providers for the Welljoy Shop
- HR, payroll and professional support services

We only share the minimum necessary information, and only when:

- It is necessary for your care
- You have consented
- We are legally required to do so
- There is a serious risk to a person's life or safety

## **7. International Transfers**

We mainly store data in the UK. Some of our technology providers (for example Microsoft 365) may process data outside the UK.

When this happens we ensure appropriate safeguards are in place to protect your information, such as:

- Adequacy decisions
- Standard Contractual Clauses
- Additional contractual or technical safeguards

## **8. How We Store and Protect Your Information**

We use secure systems including:

- Microsoft 365
- Social Rx / DMS

Security measures include:

- Encryption
- Multi-factor authentication
- Access controls and role-based permissions
- Regular monitoring, auditing and penetration testing
- Secure networks and devices
- Staff training on data protection
- Secure destruction of records

## **Online payments (Welljoy Shop)**



Payments are processed through secure third-party providers compliant with PCI DSS.

Card details are never stored on our systems.

## **9. How Long We Keep Your Information**

We retain information in line with the Records Management Code of Practice:

- Service user records: normally 8 years after last contact
- Children's records: until age 25 or 26
- Safeguarding records: up to 25 years
- Staff and volunteer records: 6 years after employment ends
- Financial / contract records: 6 years

After this, data is either securely deleted or anonymised.

## **10. Your Rights**

Under UK data protection law you have the right to:

- Access your information
- Request correction of inaccurate data
- Request erasure (where allowed by law)
- Request restriction of processing
- Object to processing
- Withdraw consent (where consent is used)
- Data portability
- Lodge a complaint with the ICO

### **10.1 Erasure caveat**

We may not be able to delete information where we must keep a care or safeguarding record for legal, clinical or regulatory reasons.

If this applies, we will explain why.

## **11. Subject Access Requests (SARs)**

To request your information:

Email: [info@wellbeingenterprises.org.uk](mailto:info@wellbeingenterprises.org.uk)

Phone: 01928 589 799

We may require ID.

We will respond within one month, unless an extension is permitted.

## **12. Data Protection Officer (DPO)**



Kristina Tischendorf

Email: [k.tischendorf@wellbeingenterprises.org.uk](mailto:k.tischendorf@wellbeingenterprises.org.uk)

### **13. Complaints**

If you are unhappy with how we use your data:

1. Contact us: [info@wellbeingenterprises.org.uk](mailto:info@wellbeingenterprises.org.uk)
2. Contact our DPO
3. Contact the Information Commissioner's Office:
  - [www.ico.org.uk](http://www.ico.org.uk)
  - 0303 123 1113

### **14. Updates to This Notice**

We may update this Privacy Notice from time to time.  
The latest version will always be available on our website.

### **Version: 1.7 (March 2026)**

Data Controller: Wellbeing Enterprises CIC

Registered address: Bridgewater House, Old Coach Road, Runcorn WA7 1QT

Telephone: 01928 589799

Email: [info@wellbeingenterprises.org.uk](mailto:info@wellbeingenterprises.org.uk)