# Two Roads Emotional Health and Safety CIO Privacy Policy

This privacy notice is subject to ongoing review and change. Last updated: 20<sup>th</sup> February 2024.

If you have any questions about this privacy notice, including if you wish to exercise any of your rights, please contact <a href="mary@tworoadscharity.com">mary@tworoadscharity.com</a>.

Or write to: Two Roads Charity, 16 Rocklyn Walk, Donaghadee. BT21 0FA

This privacy notice sets out how The Charity, a charity registered in England and Wales under charity registration number 1188672, with principal offices at 16 Rocklyn Walk, Donaghadee, BT21 0FA, uses and protects personal information that you give the Charity when you visit or use our website and other services, including events, that refer or link to this privacy notice. This also applies to introductions in a business context and shared contact information. This privacy notice may be supplemented by additional privacy statements, terms or notices provided to you.

We are committed to preserving your privacy.

# How we collect your personal data

# General: We may collect your personal data in the following ways:

- From you directly, following meetings in a business context (face to face, attendance at our events, email, mail or telephone)
- From data that you provide online via online forms (such as your name, contact details, e-mail address etc.), online forms on event sites, online surveys you reply to or requests by email or by website sign up form to subscribe to our newsletter
- From your interaction with and use of online services including the our website, apps, Twitter / X and LinkedIn feeds

If you contact us, we may keep a record of that correspondence

# Events: All delegates at our events will give their CONSENT to attend.

We will never use pre-ticked boxes or automatic opt-ins within any event registration tools. Delegates wishing to attend our events will request a delegate place in one of the following ways:

#### Eventbrite

The delegate will submit their information via Eventbrite, an automated tool used by us for event management.

Security and Compliance: Information downloaded from Eventbrite will be held in EVENT files on a password-protected network accessible to our staff only.

Eventbrite Privacy Policy and GDPR statement

#### Email

Some specialised events ask for interested delegates to email to request a place.

Security and Compliance: These emails will be held on the

password-protected system accessible to our staff only, and in EVENT files on a password-protected network accessible to our staff only.

## What information we collect

#### General: We may collect the following information:

- Name and job title
- Organisation or academic institution you are associated with
- Contact information such as an email address, postal address or telephone number
- Demographic information such as address, postcode, preferences and interests
- Your interaction with us including, but not limited to, frequency and timing of visits to our website and your engagement with our newsletters
- Financial details if payments are required (e.g., payment for event exhibition stands or tickets)
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data

# Events: If an individual attends or requests to attend an event or training course organised by the Charity, the following data will be collected:

The delegate's name, job title, company name, company website, email address and any dietary and physical access requests.

Name and job title

- Organisation or academic institution you are associated with
- Contact information such as an email address, postal address or telephone number
- Demographic information such as address, postcode, preferences and interests
- Financial details if payments are required (e.g., payment for event exhibition stands or tickets)
- Photographs and video footage of the event which may show attendees
- Other information deemed necessary to attend the event (e.g., if event places are competitive, we may ask for reasons why you wish to attend the event).

# How we use your information

### General: We use your information to:

- Keep internal records
- Store your information on our database
- Send you details of news, events or training courses that we feel may be of interest to you
- Enable us to perform and improve the services you have requested
- Respond to any queries submitted via the website, email, mail or telephone
- Ensure that content from our website is presented in the most effective manner for you and for your computer
- Analyse the information we collect so that we can administer, support, improve and develop the website and our services
- · Satisfy internal record keeping

- Contact you from time to time for research purposes in relation to our services, projects or work themes. We may contact you by email, phone or mail
- Provide you with information or services that you request from us or which we feel may interest you, unless you have indicated otherwise
- Notify you about changes to our service

# Events: The data relating to a specific event will be used as follows:

- The delegate's name and company may be included on a name badge to be worn at the event.
- The data provided by the individual will be stored in a password-protected network accessible only by our staff.
- If we intend to share this data with a third party, (for example, when holding a joint event with another organisation), this will be clearly stated on the event registration details.
- Photos and video footage from events attended by individuals may be used in publicity eg on our website, in email marketing and on future printed materials publicising the Charity.

# Who we share your data with

General and Events: We will not share your data with any third parties for the purposes of direct marketing.

Also, in order to carry out our services, we may share your personal data with one or more of the following data processors who provide elements of services for the Charity:

#### MailerLite

This is an online software package we use for email marketing.

#### Eventbrite

This online events platform is used by us to enable delegates to sign up for events. Eventbrite is based in the United States of America.

**Eventbrite** Privacy Policy

Information submitted to Eventbrite is transferred outside the EEA and stored on servers in the USA. USA is not subject to an adequacy decision by the European Commission.

Eventbrite Safeguard: Eventbrite and EU Data Protection

#### **Note: EU-US Privacy Shield**

The <u>EU-US Privacy Shield</u> is an approved certification mechanism under Article 42 of the General Data Protection Regulation which is permitted under Article 46 (2) (f) of the General Data Protection Regulation. Refer also to the <u>European Commission decision</u> and the statement by the <u>Data Protection Network</u>.

# **Legal Grounds for Processing**

We will only collect, use and otherwise handle your personal data when we have legal grounds for doing so. The common grounds will be:

# **Legitimate Interest**

We may process your personal information for our legitimate business interests. You have the right to object to this processing. When we process your personal information for our legitimate interests, we make sure to consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. Our legitimate business interests do not automatically override your interests – we will not use your Personal Data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law)

The Charity's Customer Relationship Management System holds details of individuals who have an existing relevant and appropriate relationship with the Charity. This includes:

- Existing clients
- Individuals who are already communicating with the Charity about becoming potential clients
- Individuals who are in the service of the Charity
- Stakeholders who have already communicated with the Charity

### Consent

#### Email marketing

If you wish to receive the Charity's email newsletter, you must either sign up at the Charity's website or give permission by email. This permission will be recorded and stored. By subscribing through the website or requesting the email newsletter by email, you consent to the collection, storage, use and transfer of your data by us in accordance with the terms of this Privacy Policy.

You can withdraw your consent at any point by clicking on the 'unsubscribe' link provided in the Charity's emails or by contacting the Charity directly.

# Visitors to the Charity's websiteAnalytics

When you visit <a href="www.tworoadscharity.com">www.tworoadscharity.com</a>, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to the various parts of the site. This information is only processed in a way that does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

If we do collect personal data through our website, we'll be upfront about this. We'll make it clear when we collect personal information and we'll explain what we intend to do with it.

 Cookies We use a cookies tool on our website. More information about our Cookie Policy can be found <u>here</u>.

# **Links to Third Party Websites**

As we want your experience of the Charity's website and newsletters to be as informative and useful as possible, we provide a number of links to websites operated by third parties.

Please be aware that we do not have any control over third party websites and that such third-party websites may send their own cookies to users, or otherwise collect data or solicit personal information.

We cannot be responsible for the protection and privacy of any information which you provide whilst visiting such third-party websites and so these are not governed by this privacy notice. We encourage you to review each third-party website's privacy policy/notice before browsing and interacting with the website in question.

# **Retention of your information**

We will retain your personal data for as long as we reasonably require in light of the purpose(s) for which we are holding it and all relevant legal, commercial and operational considerations.

Personal data is stored on our servers and will remain within the UK/EEA.

# Disclosure of your information

We will not share, sell or distribute any of the information you provide to us without your consent, except where disclosure is:

- Necessary to enforce our rights
- · Required or permitted by law

# Your rights under data protection laws

All individuals have a number of rights under data protection laws. However, they do not apply in all circumstances. Rights include:

- Your right of access: You have the right to ask us for copies of your personal information.
- Your right of rectification: You have the right to ask us to rectify information you think is inaccurate.
- Your right to erasure: You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing: You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to object to processing: You have the right to object to processing if we are able to process your information because the process forms part of our public tasks, or is in our legitimate interests.
- Your right to data portability: This only applies to data you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another, or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering into a contract and the processing is automated.
- You can read more about all of these rights <u>here</u>.

 At all times, you have the right to complain to the Information Commissioner's Office which enforces data protection laws: <a href="https://ico.org.uk/">https://ico.org.uk/</a>.

If you wish to exercise any of these, please email <a href="mary@tworoadscharity.com">mary@tworoadscharity.com</a> and we will explain at that time if they are applicable or not. We will inform you in writing following receipt of your written request and if necessary, seek additional information from you about your request, including proof of identity.

# **Security**

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted online or through the website. Any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

# **Changes to our Privacy Notice**

We may amend this Privacy Notice from time to time to take account of changes to our processing and regulatory changes. We encourage you to review it from time to time. If we make any substantial changes we will notify you by posting a notice on our website.

#### Your contact details

Please help us keep our records updated by informing the Charity of any changes to your e-mail address and other contact details to <a href="mailto:mary@tworoadscharity.com">mary@tworoadscharity.com</a> with the subject line "Change of details"

### **Queries and concerns**

If you have any queries or concerns about our processing of your personal data, please contact us at <a href="mary@tworoadscharity.com">mary@tworoadscharity.com</a> with the subject line "Privacy Notice".