

# Health Action Research Group

## Privacy Policy

### 1. Introduction

- 1.1 We are committed to safeguarding the privacy of our volunteers, website visitors and research participants.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of our volunteers, website visitors and research participants; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.
- 1.4 In this policy, "we", "us" and "our" refer to Health Action Research Group. For more information about us see [www.healthactionresearch.org.uk](http://www.healthactionresearch.org.uk)

### 2. Credit

- 2.1 This document was created using a template from SEQ Legal (<https://seqlegal.com>).

### 3. How we use your personal data

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) the purposes for which we may process personal data; and
  - (c) the legal bases of the processing.
- 3.2 We may process data about your use of our website ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website.
- 3.3 If you are a volunteer, we may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is yourself. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and our legitimate interests, namely the proper administration of our website and charity.

- 3.4 If you are a volunteer we may process your information included in your personal profile on our database ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, status, interests and hobbies, educational details and employment details. The profile data may be processed for the purposes of enabling and monitoring your contribution to our work, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and our legitimate interests, namely the proper administration of our website and charity.
- 3.5 If you are a volunteer we may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent and our legitimate interests, namely the proper administration of our website and charity.
- 3.6 If you are a research participant we may process your account data ("**account data**"). The account data may include your name and email address. The source of the account data is yourself. The account data may be processed for the purposes of communicating with you during a research project. The legal basis for this processing is consent and our legitimate interests, namely our charitable purposes.
- 3.7 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent.
- 3.8 We may process information contained in or relating to any communication that you send to us ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and charity and communications with users.
- 3.9 We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.
- 3.10 We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this

processing is our legitimate interests, namely the proper protection of our business against risks].

- 3.11 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.12 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### **4. Providing your personal data to others**

- 4.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- 4.2 In addition to the specific disclosures of personal data set out in this Section 4, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

#### **5. International transfers of your personal data**

- 5.1 Your personal data will not be transferred to countries outside the UK other than as set out in 5.2 below.
- 5.2 You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

#### **6. Retaining and deleting personal data**

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 The period of retention of volunteer profile data will be determined based on how long each volunteer continues to contribute to our work or displays an interest in continuing to support our work or being informed of its progress. It will be retained for a minimum period of one year following appointment, and for a maximum period of two years following the last communication received from the volunteer.

- 6.4 The period of retention of research participant account data will be determined by the nature and duration of the relevant research project. It will not be retained following completion of the research project and publication of its findings, unless the research participant displays an interest in being informed of the charity's continuing activities.
- 6.5 Where website usage data is aggregated and is used only to identify trends in website usage it is not possible for us to specify in advance the periods for which usage data will be retained. In such cases, we will determine the period of retention based on the charity's need to maintain, update and develop its website.
- 6.6 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## **7. Amendments**

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy by email.

## **8. Your rights**

- 8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:
- (a) the payment of a fee currently fixed at £10; and
  - (b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).
- 8.2 We may withhold personal information that you request to the extent permitted by law.
- 8.3 We will not share your personal data with third parties for marketing purposes; and you may instruct us at any time not to process your personal information for internal marketing purposes.

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