



Northern Ireland Chest Heart and Stroke Public Health Department's Privacy Policy

Overview:

Northern Ireland Chest, Heart and Stroke (NICHS) is committed to protecting information about you (which we call your "personal data") and clearly stating what personal data we hold about you and how we use your personal data.

This policy will clarify:

- how NICHS's Public Health Department collects personal data and
- the ways in which we use it

Personal data may be collected online, by phone, email, text, surveys, postal mail or through face to face meetings. It also explains your rights in relation to your personal information

All the information we hold is processed in accordance with the General Data Protection Act ("GDPR") and the Data Protection Act 2018 (referred to collectively throughout this document as the "Data Protection Laws") and the Personal Electronic Communications and the Privacy & Electronic Communications (EC) Directive Regulations 2003.

NICHS is the Data Controller of your personal data and if you have any questions you would like to ask, or need clarity about the storage, or use of your personal data, please contact our Data Protection Co-ordinator – Gareth McGleenon on 028 9032 0184.

This Privacy policy sets out:

1. Who NICHS is and how to contact us
2. Personal data we collect about you
3. What we do with the personal data we collect
4. Your personal rights regarding data processing
5. Children and data collection
6. Your data and NICHS's social media sites and website

Who NICHS is and how to contact us

NICHS is a leading Northern Ireland health charity. We are both a registered Northern Ireland charity and a company limited by guarantee.

1.1. Full legal information for each:

- Northern Ireland Chest Heart & Stroke (NICHS) is a charity registered in Northern Ireland. Registered Charity number NIC103593.
- Northern Ireland Chest Heart & Stroke is a company registered in Northern Ireland. Reg. Company Number NI 18889.

1.2. Contact Details:

- Phone Number: 028 9032 0184 at
- Address: 21 Dublin Road, Belfast BT2 7HB
- Web address: <https://www.nichs.org.uk>
- Email address: mail@nichs.org.uk

1. Personal data we collect about you

1.1. Personal data provided by you.

When you seek to access using our services, request information, or a telephone response, we will collect any of the following personal data - name, address, email address, phone contact number - if they are needed to process a service you are requesting. We collect this personal data to provide the service to you, and cannot provide the service without this personal data.

We will request additional personal data for specific health services you access - Gender, Month & Year of birth, Ethnicity, Disability, Sexual Orientation, Postcode, to help us provide you with an accurate picture of your health profile, to tailor our service to you and to report to our funders. We collect this personal data on the basis of our legitimate interests in promoting and managing our organisation and we balance that against your rights and freedoms. Some of this personal data is known as "special category personal data" under the Data Protection Laws. We process this

special category personal data in order to provide you with health and social care services.

We also collect personal data using Google Analytics when you visit our website. We will collect your IP address, web pages accessed, online ads interacted with, videos viewed etc. This information is collected via Cookies placed on your device. Please see section 5 below for more information on how and why we use Cookies. We collect this personal data on the basis of our legitimate interests in promoting and managing our organisation and we balance that against your rights and freedoms.

1.2. What do we do with the information?

We want you to be happy about how and when we contact you. We use personal data collected to make sure you only receive relevant information which also means we save our charity money by avoiding wastage.

Where we are marketing to you by email or telephone, we will comply with the rules of PECR and only do so where we have your consent. This consent can be withdrawn at any time as set out in the paragraph below.

We may market to you by other means (for example by post) on the basis of our legitimate interests as set out above. You can object to this at any time by contacting us.

How you want to hear from us will always be respected. If you want to change how you receive our communications by post, phone, email or text you can email info@nichs.org.uk or call our Public Health Department on 02890320184. Your data record will be updated as quickly as we can, but please allow at least 30 days covering any postal mailings that may have been generated prior to your request.

1.3. Using Legitimate Interest to process your Personal Data

We may process your personal information for our legitimate business interests.

Legitimate interest means the interests of NICHHS in conducting and managing our business to enable us to give you the best service and secure experience in your dealings with us.

For example:

- To help us make sure our marketing is relevant to you.
- To protect you against fraud when making transactions on our website and to ensure our IT systems are secure.

When we process your personal information we make sure to consider and balance any potential impact this may have on you and your rights under data protection legislation. Our legitimate interests do not override your personal interests and we will not use your personal information for activities where our interests are overridden by the impact it may have on you.

1.4. We use the personal data you provide to:

- Progress our charitable aims
- To improve our service offer and your experience
- Dispatch any communications including information leaflets and packs, health information, health check results, research applications forms, services information, surveys, letters, updates, newsletters, annual reviews and e-zines
- Record information relating to your risk factors, lifestyle, health profile, health conditions and to support you in achieving your wellbeing goals
- To inform priorities and plans for the service and public policy advocacy campaigns
- Record any contact we have with you including queries, feedback, compliments and complaints
- Comply with our legal obligations, policies and procedures
- Prevent or detect fraud or abuse of our website
- Enable service providers to carry out technical, logistical or other functions on our behalf
- Carry out research and analysis on your personal information to create a profile of your preferences and interests. We will use your personal data to tailor and improve

- Process online bookings to services
- Comply with our legal obligations, policies and procedures.
- Prevent or detect fraud or abuse of our website.
- Enable partner organisations to carry out technical, logistical or other functions on our behalf.

1.5. Sharing your information:

It is not our policy to sell or share our service user data with 3rd parties for their own marketing purposes and we will never do this. However there are occasions we may need to share your information to help us fulfil our charitable aims. For example, we may need to share your data with carefully chosen partner organisations:

- To undertake work on our behalf. Our partners include marketing agencies and consultants, mail houses, event management and IT specialists. They may be commissioned to undertake work which includes data processing, packaging, mailing and delivering merchandise or products, answering questions about products or services, sending postal mail, emails and text messages, carrying out research or analysis. We will only supply the data needed to fulfil a particular process or service.
- To enable our service delivery to you to be carried out in compliance with NICHHS or Funders' policies and procedures, including Health and Safety, Serious Adverse Incidents and Safeguarding.
- Fulfil a legal requirement by an order of the Court or law enforcement agency.
- To protect our rights, property or the personal safety of our employees or visitors to our venues, premises or websites.
- To abide by the requirements of the Data Protection Laws and the Privacy & Electronic Communications (EC) Directive Regulations 2003.

1.6. Personal data from 3rd Parties:

We may receive information from 3rd parties who supply us with personal data about you so that we may deliver the best experience for our service users and people in contact with our charity, as possible.

We check the data we hold on our databases against address registers to check for changes in circumstance, so we neither waste resources nor cause upset.

2. What do we do with personal data we collect?

2.1. Storing your information:

We place the utmost importance on the security of the personal data we hold about our service users and people in contact with our charity. Your personal data is held electronically, is stored on a database securely protected. We securely transport and store any paper records for the purposes of our services, with all data inputted into our secure database. . All records of this nature are securely stored and destroyed after a period of 6 years.

3. Communicating with you:

We will securely store personal data to reflect how our service users and the wider public in touch with us may wish to be contacted, to comply with the law and to ensure we do not communicate with people who have asked us not to. If you ask not to be contacted we will continue to hold a skeleton record of sufficient personal data, such as name and address details, so we don't accidentally contact you again in the future. Your record will then be flagged as "not active" on our database.

3.1. How long we keep your data:

We will keep your personal data for as long as you use our services. After your last point of contact with us personal data will be retained for a period of six years from the last contact, to enable NICHHS to comply with its legal financial retention period. Personal data will then be deleted from our database.

4. Your Personal rights regarding data processing

The Data Protection Laws and PECR 2003 give you certain rights over your data and how we use it. These rights are generally all provided free of charge (unless they are manifestly unfounded or excessive) and will be actioned within one month (unless the request is complex or you have made a number of requests. These are:

If you wish to exercise any of these rights please contact our Data Protection Co-ordinator in writing at NICHHS, 21 Dublin Road, Belfast BT2 7HB or by emailing gmcleeon@nichs.org.uk

Please note, we may not always be in a position to comply with your request, but we will let you know if that is the case. These are:

- **Right of Access:**
You can request a copy of the information we hold about you.
- **Right to Rectify:**
You have the right to request a change to your data to ensure accuracy if it is factually incorrect.
- **Right of Erasure:**
In certain circumstances, you have the right to request your data is deleted.
- **Right to Restrict Processing:**
You have the right to request your data is no longer processed, but not deleted.
- **Right of Portability:**
In certain circumstances, you can request your data is given to you in a common usable format such as a word document or pdf.
- **Right to Object:**
You can object to your data being processed in certain circumstances, for example when we are processing it on the basis of our legitimate interests.
- **Right not to be Profiled:**
You can object to your data being used to generate a profile about you.
- You also have the right to withdraw your consent where we are processing your personal data on the basis of your consent. .

You have the right to complain to the Information Commissioners Office (the "ICO") about how we treat your personal data and you can contact them by email casework@ico.org.uk or telephone 0303 123 1113.

For more information about your rights under the Data Protection Act 2008 go to the Information Commissioner's website at ico.org.uk.

NICHHS is not a 'public authority' as defined under the Freedom of Information Act 2000 and we will not therefore respond to requests for information made under this Act.

5. Children and data collection:

We identify a child as anyone under the age of 18 years.

Our Schools Chester's Programme and health talks are offered to children in primary schools and health talks are offered to young people in other settings.

We collect and securely store the following information: school addresses, phone numbers, contact email addresses, pupil's names and gender. This data is used to improve the service and for evaluation and funders reports.

We store all information collected and provided, both on paper and electronically, in secure conditions. The names of young people participating in our 3-week schools are collected for evaluation purposes and to issue a certificate to each student at the end of the programme. After 3-weeks, at the end of the programme, the names are securely deleted.

We may occasionally publish research or statistics about health at young people generally. When we do this it will be compiled from, data acquired from many different organisations and will not refer to named individuals.

6. NICHS Social Media Sites and the NICHS Website

6.1. Cookies

A cookie is a small text file which is placed onto your computer (or other electronic device) when you access our website.

For more information about the cookies on our website, please see our Cookie Policy at www.nichs.org.uk/cookies.

6.2. Keeping you safe on our website:

“We keep your personal information secure when you visit our website using encrypted SSL technology supplied by Globalsign.com

We undertake social media activity including Facebook, Twitter, Instagram and YouTube. Although this policy covers how we will use any personal data collected from those web-pages, it does not cover how the providers of social media platforms will use your personal data.

Please ensure you read the privacy policy of the relevant social media platform before sharing data. You can make use of the privacy settings and reporting mechanisms in your browser to control how your data is used.”

7. Other people’s data on social media.

Some of the services we offer allow you to provide the personal data of other people such as tagging people on photos on social media. Before providing anyone else’s personal data please ensure they are happy for you to do so and under no circumstances must you make public another individual’s personal data.

8. Conclusion

This policy may change or be updated from time to time. Changes will be posted on this web page and will apply from the time they are posted. The posting date of this policy is 25th May 2018.

If you have any questions about this policy or would like any further information in relation to how we use data please contact the Data Protection Co-ordinator at NICHHS, 21 Dublin Road, Belfast BT2 7HB.