

Effective date: 01/03/2021

Introduction

Orchard is a registered charity in England and Wales (1174480). We are committed to protecting your privacy and security as well as being transparent about how we intend to store, use and share your information.

This policy explains how and why we use your personal data, to ensure you can make informed choices and be in control of your information at Orchard. Our practices are aligned with the General Data Protection Regulation (GDPR), which replaces the Data Protection Act 1998, and came into effect on 25 May 2018, and the existing ePrivacy regulation, called the Privacy and Electronic Communications Regulation (PECR). In order to make sure that personal information of non-UK and non-EU residents is protected accordingly, we have also adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), California Online Privacy Protection Act (CalOPPA), Canada's Personal Information Protection and Electronic Documents Act (PIPEDA), South Africa's Protection of Personal Information (POPI) Act and Japan's Act on the Protection of Personal Information (APPI).

If there are any terms in this privacy notice that you do not agree with but you had already shared your personal information with us, please get in touch and we will ensure that your personal information is erased immediately. See Section '9. Privacy Policy Complaints and Enquiries' for contact information.

Orchard's accountability

As part of Orchard's induction process, all staff and volunteers sign a confidentiality agreement and in so doing agree to follow regulatory practices and this policy. Any staff member's behaviour which breaches this policy and regulatory requirements alike, will be taken very seriously by Orchard and will be subject to investigation and disciplinary action where appropriate.

What this policy covers

- What 'processing' means
- Why do we collect your information?
- What information do we collect?
- How we collect your information
- Information we collect directly from you

- Information we collect indirectly from you
- Why is your information important to us?
- How we combine and analyse your information
- Research and profiling
- Why consent is important to both you and Orchard
- Your rights
- How we protect data
- Our work with third parties
- Monitoring vulnerability (including children and young people)
- Changes to Orchard's privacy policy

1. What 'processing' means

'Processing' is the action that Orchard, or a trusted third party, takes when collecting, updating and uploading an individual's personal information to produce meaningful information which helps Orchard to grow and develop. This information is used to administer your account on our database and helps Orchard to deliver best practice and the best experience for you.

2. Collecting information about you

2.1 Why we collect your information

At Orchard, we would like to build long-lasting relationships with you based on trust, transparency and compassion. Processing your information collected in surveys helps us develop long term research directions and goals.

Your information enables us to understand you better and be more appropriate when communicating with you. For instance, we are able to recognise and acknowledge your support and the commitment you show towards Orchard over the years. In turn, this better equips us to handle enquiries, deliver materials and process payments. However, above all, it facilitates us in providing quality support.

2.2 Information we collect directly from you

We may collect information directly from you whenever you come into contact with Orchard. For example, when you contact Orchard about our activities, sign up as a supporter, send or receive information, engage with our social media or donate

– you provide us with your personal information at your discretion. We may also collect information through surveys we send out, however, any personal information collection is on a voluntary basis. You may remain anonymous and do not need to provide any if you do not wish to.

- **Personal details:**
 - Your email, telephone etc. when you sign up as a supporter
 - We may also collect age and/or gender where appropriate (e.g. when registering for an event or completing a supporter survey)
 - Perhaps you have shared your own experience of mental health and have given us permission to store this information and/or share it
- **Your contact preferences:**
 - You can tell us how you'd like to be contacted and through which channels. You can be as selective as you wish in order to help us get this right for you

In order to ensure accuracy of your data Orchard can only take reasonable steps to create an accurate record for you. However, we look to you for ensuring the on-going accuracy of your personal data is correct.

We encourage you to take responsibility for reporting personal data amendments by contacting Orchard. Under data protection law, certain categories of personal information are recognised as sensitive personal data (such as information relating to health, racial and ethnic origin, beliefs or political affiliation, membership of a trade union or other professional body). In limited cases, we may collect sensitive personal data about you, for example your experience of mental health.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

We only collect this sensitive personal data if there is a clear reason for doing so. For instance, some of our supporters give in memory of a loved one, perhaps someone they have sadly lost to suicide. We would like to note this on their record to make sure we are sensitive to this and give the right support.

Whatever sensitive information we do hold, we will never share unless we have your explicit consent.

3. Using your information

3.1 Why your information is important to us

Your information helps us to fulfil the following activities:

- Giving us at Orchard an understanding of the issues and queries for the OCD community, which will help inform future research, funding and policy decisions
- The contextual information provided is used to try and decipher where there are socio-economic differences in the OCD community and whether this affects outcomes/opinions
- If you provided an email/phone number, it is so we can contact you for potential further interviews. These will be to gain a deeper understanding into the backgrounds of the community and gives you a chance to elaborate more on your thoughts
- We may share the non-identifiable information you have provided us with partner charities and organisations in the future for research purposes

3.2 How we combine and analyse information

- We will not contact you with any advertising material throughout the process or after the survey is completed
- We may contact you further if you have provided us with contact information and consented, for further interviews
- Under the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information is your consent. You are able to remove your consent at any time. You can do this by contacting info@orchardocd.org.
- Your names will not be disclosed in the presentation to Orchard or partner charities

4. Consent

4.1 Why consent is important to both you and Orchard

Orchard is committed to being clear and transparent about how we might use your data in future when it is provided. We strive to provide practical and easy ways for people to change their contact preferences and information during all interactions.

By disclosing personal information to Orchard you are consenting to the collection, storage and processing of information in the manner described in this policy, unless clearly stated otherwise.

4.2 Your rights

We want to inform you of your rights when it comes to your information and we would like to help you to better understand them. These are:

- **The right to object.** You always have the option to stop receiving information from us across all of our communication channels. This is at your discretion and we will respect your choice. However, for us to enact this we encourage you to notify us
 - Details of how to do this can be found on all of our communications and within this document
- **The right to access a copy of the personal data we hold.** You, or an organisation with legal purpose, can request a copy of your personal data for legitimate purposes. This is known as a 'Subject Access Request' and you can request this by emailing info@orchardocd.org
 - Please note that proof of identity and the reason for your request will be necessary for Orchard to respond appropriately. We may ask for further details if needed
- **The right to be “erased”.** This is where you can request Orchard to delete the data we hold on you. Please note that this will not apply if there is lawful duty for us to continue to use the data we hold about you
- **The right to rectify inaccurate data.** As detailed above you can make corrections to the data we hold about you
- **The right to object to your data being used for marketing.** You can find more information about how to opt out of marketing communications below

5. How we protect data

Orchard recognises that privacy is important to our supporters, funding applicants and other contacts. The information submitted or collected by Orchard will be kept confidential and secure. We will take all reasonable measures to ensure we keep your information secure, accurate and up to date, and store it only for as long as is reasonable and necessary. Your personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

Information will be processed only by Orchard data controllers, or on our behalf under strictly regulated conditions and in line with the provisions of data protection laws. Orchard data controllers are members of staff who have access to our databases or data storage systems and have received data protection training. We will take all appropriate security measures to ensure any platforms related to Orchard have gone through a quality control process to ensure security. However, given the nature of the internet we cannot guarantee complete security.

6. Our work with third parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

For operational reasons, or in order to meet specific requests, data may also be processed on Orchard's behalf by external organisations. In these instances, data will be handled under strictly regulated conditions and in accordance with the data protection and security regulations.

Third parties will only handle Orchard's data once we have screened their best practice policies and reviewed their:

- Methodology for being compliant with regulations
- Processes for monitoring quality control
- Methodology of conducting due diligence

We will never sell your details and will only share your details with third parties (who are not working with us directly) with your explicit consent.

We will only disclose information in one or more of the following circumstances:

- Where consent has been obtained
- Where there is a legal obligation
- Where there is a public duty (e.g. legal reasons)
- In connection with the transfer of all or any of rights and obligations to a third party (for example if we merged with another organisation)

7. Monitoring vulnerability

7.1 Children and Young People

It's important that children and young people can share their experience and views on mental health, and we are committed to ensuring real life experience guides our work and priorities. However, for research projects that we conduct in which identifiable information is disclosed by participants, we require the participants to be of legal age.

7.2 Safeguarding

Orchard is committed to protecting all individuals by putting appropriate measures in place which prevent harm or damage.

Our work in mental health does mean that we come into contact with people who may be vulnerable in different ways. Orchard takes this responsibility very seriously and we try to ensure that people feel comfortable to raise any concerns should they arise.

8. Changes to Orchard's privacy and data protection policy

We keep this policy under regular review and change it to comply with any new legal requirements or privacy directives.

Please visit this webpage to keep up to date with any changes to our privacy policy.

9. Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us:

Address: ORCHARD, 66 Devonshire Road, Cambridge, CB1 2BL, UK

Email: info@orchardocd.org

Phone: +44 7886 709633