Be Well Support: Privacy Notice

About us

Be Well Support is a trading name of Make A Difference (UK) Limited (MAD); a UK company, registration number 04476666. Our ICO license number is ZA786690.

MAD are committed to ensuring your personal data is protected. This Privacy Notice explains how we collect, store, and use personal data.

This notice sets out who we are, why we collect personal data, how we use that personal data, who we share the data with and how you can exercise your data subjects' rights.

MAD as a Data Controller

We act as a Data Controller for all personal data processed when:

- an individual or a client organisation enquires about or enters into an agreement for our Wellbeing services
- when additional data is provided to us by an individual accessing Wellbeing services
- When an individual or organisation communicates with us, completes a voluntary survey, or otherwise provides feedback on Wellbeing services
- When visiting our website

MAD as a Data Processor

We act as the client organisation's data processor when receiving and handling personal data related to the organisation's authorised service users under their agreement.

The client organisation ***must*** meet their data protection obligations concerning the disclosure of this data and document the lawful basis for providing this data to us in its Privacy Notices.

This privacy notice applies to:

- Individuals or organisations that enquire about our Be Well Support Services
- Clients - organisations or individuals who have an agreement with us
- Individuals who manage and administer client accounts
- Authorised users who access Be Well Support services under a client's agreement
- Visitors to our website

This privacy notice applies to data collected:

- via our website
- over the phone
- by letter, email, or other written communication including our social media channels
- face-to-face, for example at conferences and exhibitions

Data Protection Principles

Personal Data must be processed following the six Data Protection Principles. It must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely

This Privacy Notice sets out how MAD complies with these data processing principles.

Where we might collect personal data from

Depending on the information required we may collect personal data from various sources, including:

- the potential/actual client (individual or organisation)
- an authorised user of Wellbeing services.
- visitors to our website

We may, from time to time, receive information about you from third parties we work with including business partners, third-party processors, or payment service providers.

Categories of personal data we collect

We collect different categories of personal data depending on your relationship with us:

Potential Clients

If you are considering entering into an agreement for Wellbeing services, we may collect:

- Contact details, including your name, organisation name and your role/position (if relevant), email address, and telephone number.
- Marketing preferences and satisfaction surveys.
- Phone calls which may be recorded for training or monitoring purposes, and other communications.

We use this information to respond to your query, including providing you with any requested information about our products and services. We may also email you several times after your enquiry to follow up on your interest and ensure that we have answered your query to your satisfaction. We will do this based on our legitimate interest in providing accurate information before the sale of service provision.

Clients

If you have an agreement with us, we may collect:

- contact details of the individual/s responsible for the management of the agreement including

name, date of birth, role/position and the name of the organisation (if relevant), email address, details for account login, phone number, details of the wellbeing service/s required, the number of sessions (individual accounts only), payment card details.

- service user registration details including name, date of birth, gender, marital status, home address and medical history.
- phone calls which may be recorded for training or monitoring purposes, and other communications
- Marketing preferences and satisfaction surveys
- Payment card details

We require this information to set up your account, verify your payment card details, process your payment, verify service users, and arrange Wellbeing service provision.

We may also send you a receipt and other communications via email, and we may use your telephone number to contact you regarding your account and/or the Wellbeing service provision.

Nominations for the Be Well Support Ambassador Programme

If you wish to nominate your child, or your child wished to nominate themselves for the Be Well Support Ambassador programme we will collect the child's name, email address, age, school name and postcode, and the parent's name. We will collect this data based on parental consent.

All reasonable measures will be taken to validate parental consent before engaging with the child. Consent may be withdrawn at any time.

Additional Data Collected Via Our Website

Our website uses cookies to allow it to function properly, collect useful information about its visitors and help improve your user experience better. For more information on how we use cookies please see our ***Cookie Notice https://bewellsupport.com/cookies/***

We use a third-party service, Google Analytics, to collect standard internet log information and details of website visitor behaviour patterns. We use this information to improve the website experience and to collect aggregate data related to the number of visitors to our website. We do not make or allow Google to make, any attempt to identify individuals visiting our website.

Website Live Chat Function

The Be Well Support integrates Facebook Messenger Chat into its website to enable you to live chat with our support/sales teams. For more information on how Facebook Messenger uses your personal data please see here:-

https://www.facebook.com/privacy/explanation/

https://www.facebook.com/policies/cookies/

Third-Party Links

The Be Well Support website may include links to third-party websites including Facebook, Twitter, LinkedIn, Pinterest, YouTube and TikTok and others.

Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website via a link we encourage you to read the privacy notice of every website you visit.

How we use personal data

We use personal data to:

- provide service information and quotations on request
- set up your account
- take payments
- manage your agreement
- deliver Wellbeing services
- comply with our legal obligations
- communicate with you
- manage complaints and testimonials
- assess the performance of the services we offer
- send marketing, promotional or customer service communications.
- to consider nominations for the Be Well Support Ambassador programme

Change of Purpose

We will only use your personal information for the purposes for which it was collected unless we reasonably consider that we need to use it for another reason, and that reason is compatible with the original purpose.

If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the lawful basis which allows us to do so or seek your consent before the processing begins.

Lawful Bases for Processing

Where MAD is acting as a Data Controller in its own right our lawful bases for processing are:

- under a contract, or to take steps before entering into a contract
- to comply with a legal obligation
- to protect the vital interests of the data subject or another natural person
- in pursuit of our legitimate interests as a business providing wellbeing services to Client organisations including:
    - monitoring capacity and quality to deliver an appropriate level of service to our clients
    - marketing our services including providing information about services that are



or may be of interest to you
    - and building relationships with current and prospective clients
- the data subject or their authorised representative (parent/carer) has freely given consent

Special category data is processed under the following lawful bases:

- the data subject or their authorised representative (parent/carer) has given their explicit consent
- to ensure the vital interests of the individual where they are physically or legally incapable of giving consent
- to establish, exercise or defend legal claims
- processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Data Storage and Retention

All personal data is kept on encrypted servers and encrypted backup servers located in the UK.

We will only retain personal data for as long as reasonably necessary to fulfil the relevant purposes for which the data was originally obtained. This will generally be for as long as:

- the agreement is in force
- necessary to comply with any legal and/or regulatory obligations, and
- as governed by the Limitation Act (1980)

Typically, personal data related to enquiries and information requests are retained for 3 years. Otherwise, personal data is retained for up to 7 years following the termination of an agreement.

Occasionally, such as if there is a dispute or legal action, we may be required to keep personal information until the issue is resolved.

Who do we share personal data with?

We do not share personal data unless the law and our policies allow us to do so.

Our suppliers, service providers and consultants require access to personal data to enable the provision of Wellbeing services to clients. We may share limited personal data with:

- specific Wellbeing service providers who require access to personal data to arrange and deliver wellbeing services for clients.
- other third-party service providers including:
    - IT, website, cloud storage, and system administration services
    - Payment card services – Stripe Payment Ltd
    - Professional advisers, consultants, auditors, and insurers

- Any other third parties that we will inform you of from time to time

In all instances we will:

- establish a data-sharing/data processing agreement with the service provider or contractor, either in the contract or as a standalone agreement, to ensure the fair and lawful processing of personal data under the Data Protection legislation.
- only share data to the extent that the supplier or contractor needs it to deliver their service, and to keep them safe while working with you and us.

We may also share the contact details of your organisation with other companies within the group if we believe their services would be of interest and benefit to you.

Transferring Data Outside of the UK

Data protection legislation prohibits the transfer of personal data outside of the United Kingdom unless appropriate safeguards are in place.

MAD transfers data to third-party service providers within the EU based on an adequacy decision by the Secretary of State. These service providers include:

- Stripe Payments Europe LTD (Dublin)
- Any other service provided we will inform you of from time to time

Data Security

We have put in place appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered, deleted or disclosed.

In addition, access to personal data is limited to those employees, consultants, service providers and other third parties who have a business need to know. They will only process personal data on our instructions, and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of any actual or suspected breach where we are legally required to do so.

Data Subject Rights

Individuals have the right to:

- Make a Subject Access Request (SAR) (see below)
- Withdraw consent to data processing at any time where consent is the sole lawful basis for the processing of that data.
- The rectification, erasure or restriction of processing of personal data, or object to the processing of it (in certain circumstances)
- Prevent the use of personal data for direct marketing
- Challenge processing which has been justified based on legitimate interests

- Request a copy of agreements under which personal data is transferred outside of the United Kingdom, if relevant
- Object to decisions based solely on automated decision-making or profiling. Make A Difference (UK) Limited does not use automated decision-making and/or profiling in any of its processes and procedures
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

For more information about your data subject rights please see here

Subject Access Requests (SAR) and other Data Subject Rights Requests
All data subjects may exercise the rights listed above (where relevant), under the UK GDPR.

Where we act as a Data Controller (see above) and you wish to exercise any of your data subject rights, please contact us directly (See 'Contacts' below).

Where a SAR or any other data subject rights' request is received relating to personal data belonging to a client organisation (Data Controller), and where Make A Difference (UK) Limited is acting as the Data Processor, the request will be forwarded to the client organisation without response to the data subject.

Make A Difference (UK) Limited shall assist the Data Controller in the fulfilment of their obligation to respond to any data subject rights request if the response requires our assistance and the provision of information and documentation.

Your Duty to Inform us of Changes
The personal information we hold must be accurate and kept up to date. Please keep us informed of any changes during the term of your agreement.

Contacts
Make A Difference (UK) Limited, 44 Tyndall Court, Peterborough, United Kingdom, PE2 6LR
Email: admin@bewellsupport.com
Tel: 01773 477600

If you have any questions or concerns about how we process personal data, please email your query to dpo@uk-sas.co.uk

Or write to:

Data Protection Officer, Trigg House, 11 Maisies Way, South Normanton, Derbyshire, DE55 2DS.

If you have concerns that we are not able to resolve to your satisfaction you can register a concern with the UK's data protection regulator, the Information Commissioner's Office by following this link https://ico.org.uk/make-a-complaint/

Monitoring & Review

This Privacy Notice will be reviewed every two years or as necessary in response to changes in the data protection legislation or our processing activities.

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates.

Effective Date:	August 2023
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