|  |
| --- |
| **Mindful Workplace Community Website and Mighty Networks**  **Privacy Notice** |



# PRIVACY NOTICE TABLE OF CONTENTS

|  |  |
| --- | --- |
| **Topic** | **Page number** |
| ABOUT US | 1 |
| USEFUL WORDS AND PHRASES | 2 |
| WHAT INFORMATION DO WE COLLECT? | 3 |
| WHY DO WE PROCESS YOUR PERSONAL DATA? | 4 |
| WHEN WILL WE DELETE YOUR DATA? | 5 |
| HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL? | 5 |
| WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA? | 7 |
| YOUR RIGHTS | 8 |
| OTHER INFORMATION | 12 |

# ABOUT US

The Mindful Workplace Community is a part of the Mindfulness Initiative (**'we'** or **'us'** or **"MWC"**). We are a 'data controller' for the purposes of the Data Protection Laws, and we are responsible for, and control the processing of, your personal information.

The information provided in this notice (we call it the "Privacy Notice") relates to the Mindful Workplace Community. We take your privacy very seriously and we ask that you read this Privacy Notice carefully as it contains important information on:

* your Rights
* the personal information we collect about you
* what we do with your information, and
* who your information might be shared with.

**If you need extra help**

If you would like this notice in another format (for example: audio, large print, braille) please [contact us](#bookmark=id.1fob9te).

**Our Privacy Manager**

* Name of Privacy Manager: Ruth Ormston
* Registered Office:

The Mindfulness Initiative

Union Street

18-20 Union Street

Sheffield

S1 2JP

* Email: ruth@mindfulnessinitiative.org.uk

**How you can contact us**

Please contact us if you have any questions about this Privacy Notice or the information we hold about you. If you wish to contact us, please send an email to ruth@mindfulnessinitiative.org.uk

# USEFUL WORDS AND PHRASES

Please familiarise yourself with the following words and phrases as they have particular meanings in the Data Protection Laws and are used throughout this Privacy Notice:

|  |  |
| --- | --- |
| **Personal Data** | meansany information from which a living individual can be identified.  This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs, voice recordings. It will also include expressions of opinion and indications of intentions about [data subject](#bookmark=id.3dy6vkm)s (and their own expressions of opinion/intentions).  It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future. |
| **Processing** | This covers virtually anything anyone can do with personal data, including:   * obtaining, recording, retrieving, consulting or holding it; * organising, adapting or altering it; * disclosing, disseminating or otherwise making it available; and * aligning, blocking, erasing or destroying it. |
| **Data Subject** | The person whom the data is about. |
| **Data Protection Laws** | These are the laws governing the use of your personal data, in order to protect your privacy. In the UK, these are the European General Data Protection Regulation (EU) 2016/679 ("GDPR") and the UK Data Protection Act 2018. |
| **Information Commissioner** | The UK Information Commissioner is responsible for implementing, overseeing and enforcing the Data Protection Laws. |
| **Data Controller** | This means any person who determines the purposes for which, and the manner in which, any personal data are processed. |
| **Data Processor** | This means any person who processes the data on behalf of the data controller. |
| **Data Protection Officer** | This is the designated person within MWC who is responsible for ensuring that the Data Protection Laws are adhered to. |

# WHAT INFORMATION DO WE COLLECT?

**Personal information provided by you**

We collect and process personal information about you (such as your name, address, email address, job role details, photo, social media information and payment details) when you apply for a membership with us, or register for an event that we are hosting or organising, either on our own behalf, or in collaboration with others. We also collect personal information when you contact us, send us feedback, post material to our website, complete surveys, or sign up to our newsletter.

We ask you to provide us with the information described above for the following purposes:

* To provide membership services, including but not limited to
  + Running events and webinars
  + Sharing articles;
  + Sharing social media posts.
* To provide and manage events provided to prospective members of the community or to individuals registering for an event we are hosting or organising, either on our own behalf, or in collaboration with others.
* To provide newsletters about our work to individuals that opt in to receive such communication;
* To tailor and personalised your user experience by making it easier for you.

[**Sensitive personal data**](#bookmark=id.3j2qqm3)

We do not plan to ask you for sensitive personal data. However, in case this is deemed necessary, we will, at the time of the request explain why we are requesting it and how we intend to use it, and if appropriate, we will ask for your consent first.

**Personal information about other individuals**

If you give us information on behalf of someone else, you confirm that the other person has appointed you to act on his/her behalf and has agreed that you can give us their personal data and process it.

# WHY DO WE PROCESS YOUR PERSONAL DATA?

We use your personal data for the following purposes listed in this section. We are allowed to do so on certain legal bases.

**We collect your information so that we can:**

* take payments through Mighty Networks and Stripe for your membership plan.
* provide memberships benefits including discounts and publications
* provide you with information about events that we are hosting or organising, either on our own behalf, or in collaboration with others.
* tailor and personalise user experience on Mighty Networks;
* for compliance and fraud prevention; and
* monitor our website and Mighty Networks usage to improve our services.

**Monitoring and recording communications**

We may monitor and record communications with you (such as telephone conversations and emails) for the purposes of keeping accurate correspondence for quality assurance, training, fraud prevention and compliance.

**Marketing**

We may, occasionally, send you information by electronic means (this includes email) or competitions and special offers which may be of interest to you. We may also send you information on the wider work of the Mindfulness Initiative, as well as fundraising emails.

If you have consented to receive marketing from us, our group or other businesses, you can opt out at any time. See ['Your Rights'](#bookmark=id.1y810tw) for further information.

**Use of cookies**

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

For further information on our use of cookies, please see our Website cookie police <https://www.mindfulworkplace.community/cookie-policy/>.

# WHEN WILL WE DELETE YOUR DATA?

The table below provides details about how long we will process your data.

|  |  |
| --- | --- |
| Data we process | How long this will be held for |
| Name, address, email, work email, mobile, work mobile, title, job title, work address. Record of conversations for CRM purposes. Category – nature of your role, where you trained, qualifications. | A maximum of 12 months after the termination of your membership |

# HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?

We are allowed to process your personal data for the following reasons and on the following legal basis:

**Consent**

You have given consent for the following purposes:

|  |  |
| --- | --- |
| Purpose for which consent was obtained from you: | How you have given your consent: |
| To provide you with our newsletter | Read and enter your name in the box and select the consent box for this purpose. |
| To collect cookies on our Website | Read and select the consent box for the purposes of collecting certain cookies. |

**Contract**

It is necessary for the performance of the contract you have agreed to enter with the MWC. For example, because you are paying for a membership service that is provided by MWC, we are required to process your data for the purposes of performing the membership services appropriately.

**Legal obligation**

We are subject to legal obligations to process your data for the purposes of compliance provided in UK/Union law;

**Legitimate interest**

* Processing your data is also legal if it is based on our 'legitimate interests'. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. The table below explains the personal data processed on this basis.
* Please be aware that [you have the right](#bookmark=id.1y810tw) to object to the processing of your data of any of the legitimate interests identified.

**How We Keep Your Data Secure**

We use technical and organisational measures to safeguard your personal data - for example we use secure connections on our website to ensure that your website is encrypted. This means that we convert your data into a computer code, which will make it harder for hackers to access your data on our website. If you want to know how we are keeping your data secure, click here.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data that are transferred from you or to you via the internet. If you have any particular concerns about your information, please contact us (see 'How you can contact us?' above).

# WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?

We may disclose your personal data to:

|  |  |
| --- | --- |
| **Personal Data** | **Who information is shared with** |
| Name, address, email, work email, mobile, work mobile, title, job title, work address. Record of conversations for CRM purposes. Category – nature of your role, where you trained, qualifications. | Mindfulness Initiative and its consultants may have access to this data as they are the main umbrella charity for the MWC. |
| Name, address, email, work email, mobile, work mobile, title, job title, work address, any comments on likes you make on posts in the Mighty Network community hub. | Mindfulness Initiative and its consultants may have access to this data as they are the main umbrella charity for the MWC.  Mighty Networks will have access to this data as you will access membership services through this hub. |
| Name, email address, membership joining date and card payment details (which may include your address). | Stripe - because they provide services to us so we are able to take payments from you.  Eventbrite – because they provide services to us so we are able to take payments from you.  Event partners, where we are collaborating with them in relation to an event that you have registered for on our website.  Mighty Networks – the online community hub used for the MWC. This is the online hub throughout which our events, and the majority of information about the MWC is shared with members. |

**Transfers of your data to another organisation**

We may transfer the personal data you have provided to us to another organisation in the event that they take over the operation and running of the Mindful Workplace Community.

**Transfers of your information out of the UK and EEA**

We will need to transfer your personal data to Stripe in order for you to make payments for us. Stripe are based in Ohio, USA and your data will be stored for payment processing purposes. To find out how Stripe process your personal information, please review their privacy policy. <https://stripe.com/gb/privacy>

We also provide the majority of our members services through Mighty Networks, a service of Mighty Sofware Inc, who are based in the US. To find out about how Mighty Networks process your personal information, please review their privacy policy [here](https://www.mightynetworks.com/privacy-policy?_gl=1%2A8gjfo0%2A_ga%2AMzcxMDQwODgzLjE2MzcxNjk4NTk.%2A_ga_T49FMYQ9FZ%2AMTYzNzY3NzM5Mi42LjEuMTYzNzY3ODkzNi4w)

Any transfer of your data will be subject to a European Commission approved contract that will safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms.

# YOUR RIGHTS

As a data subject, you have the following rights under the Data Protection Laws:

* the right of access to personal data relating to you
* the right to correct any mistakes in your information
* the right to ask us to stop contacting you with direct marketing
* rights in relation to automated decision taking
* the right to restrict or prevent your personal data being processed
* the right to have your personal data ported to another data controller (e.g. if you decide to contract with a different supplier).
* the right to erasure
* The right to withdraw consent

These rights are explained in more detail below, but if you have any comments, concerns or complaints about our use of your personal data, please contact MWC at info@mindfulnessinitiative.org.uk. We will respond to any rights that you exercise within a month of receiving your request, unless the request is particularly complex, in which case we will respond within three months.

**Right to access personal data relating to you**

You may ask to see what [personal data](#bookmark=id.2et92p0) we hold about you and be provided with:

* a copy;
* details of the purpose for which it is being or is to be [processed](#bookmark=id.tyjcwt);
* details of the recipients or classes of recipients to whom it is or may be disclosed, including if they are overseas and what protections are used for those oversea transfers;
* the period for which it is held (or the criteria we use to determine how long it is held);
* any information available about the source of that data; and
* whether we carry out an automated decision-making, or profiling, and where we do information about the logic involved and the envisaged outcome or consequences of that decision or profiling.
* Requests for your [personal data](#bookmark=id.2et92p0) must be made to info@mindfulnessinitiative.org.uk] in writing.
* To help us find the information easily, please give us as much information as possible about the type of information you would like to see.
* If, to comply with your request, we would have to disclose information relating to or identifying another person, we may need to obtain the consent of that person if possible. If we cannot obtain consent, we may need to withhold that information or edit the data to remove the identity of that person if possible.
* There are certain types of data which we are not obliged to disclose to you, which include [personal data](#bookmark=id.2et92p0) which records our intentions in relation to any negotiations with you where disclosure would be likely to prejudice those negotiations.

**Right to correct any mistakes in your information**

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do this, please:

* email, call or write to us [info@mindfulnessinitiative.org.uk](mailto:info@mindfulnessinitiative.org.uk), write to

The Mindfulness Initiative

Union Street

18-20 Union Street

Sheffield

S1 2JP

* let us have enough information to identify you (eg account number, user name, registration details), and
* let us know the information that is incorrect and what it should be replaced with.

**Right to ask us to stop contacting you with direct marketing**

You can ask us to stop contacting you for direct marketing purposes. If you would like to do this, please:

* email, call or write to us [ruth@mindfulnessinitiative.org.uk](mailto:ruth@mindfulnessinitiative.org.uk) write to

The Mindfulness Initiative

Union Street

18-20 Union Street

Sheffield

S1 2JP

* You can also click on the 'unsubscribe' button at the bottom of the email newsletter. It may take up to 14 days for this to take place.
* provide proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
* provide us with details of your preferred method of contact (for example, you may be happy for us to contact you by email but not by telephone).

**Rights in relation to automated decision taking/making**

You may ask us to ensure that, if we are evaluating you we don't base any decisions solely on an automated process and to have any decision reviewed by a member of staff.

These rights will not apply in all circumstances, for example where the decision is authorised or required by law and steps have been taken to safeguard your interests.

**Right to prevent processing of personal data**

From 25 May 2018 and in accordance with the General Data Protection Regulations 2018, you may request that we stop processing your personal data temporarily if:

* You do not think that your data is accurate. We will start processing again once we have checked whether or not it is accurate;
* the processing is unlawful but you do not want us to erase your data;
* we no longer needs the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or
* you have objected to processing because you believe that your interests should override MWC legitimate interests.

**Right to erasure**

From 25 May 2018 and in accordance with the General Data Protection Regulations 2018, you can ask us to erase your personal data where:

* you do not believe that we need your data in order to process it for the purposes set out in this privacy notice;
* if you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data;
* you object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or
* your data has been processed unlawfully or have not been erased when it should have been.

**Right to withdraw consent**

We will not process your personal data until you have given your consent for [one or more specific purposes](#bookmark=id.26in1rg) as listed above. As well as clearly expressing consent, you also have the right to withdraw consent you have given us at any point. This is a vital and necessary aspect of consent, and at MWC we are aware that you may wish to withdraw consent at any time. We make this easy for you by unsubscribing to our emails by clicking the link at the bottom of the emails we send to you,

**What will happen if your rights are breached?**

You may be entitled to compensation for damage caused by contravention of the [Data Protection Laws.](#bookmark=id.4i7ojhp)

**Complaints to the regulator**

It is important that you ensure you have read this Privacy Notice - and if you do not think that we have processed your data in accordance with this notice - you should let us know as soon as possible. Similarly, you may complain to the Information Commissioner's Office. Information about how to do this is available on his website at [www.ico.org.uk](http://www.ico.org.uk).

# OTHER INFORMATION

**Copies of your personal data (Data portability****)**

In accordance with the General Data Protection Regulations 2018, you may ask for an electronic copy of your personal data which we hold electronically and which we process when we have entered into a contract with you. You can also ask us to provide this directly to another party.

**Changes to the Privacy** **Notice**

We may change this Privacy Notice from time to time. You should check this Notice occasionally to ensure you are aware of the most recent version that will apply each time you access this website or Mighty Networks.

**Last Updated: 23 November 2021**