

## Welcome to Simplyhealth's Mental Health Aware privacy policy

Simplyhealth respects your privacy and is committed to protecting your personal data. This privacy policy explains in detail the way in which any personal data you provide to us is used and kept safe by Simplyhealth.

### Who we are and about this privacy policy

Simplyhealth is a group of companies made up of Simplyhealth Group Limited and the companies it owns and controls. For simplicity throughout this policy, 'we' and 'us' means Simplyhealth. Depending on which of our products and services you ask us about, buy or use, different companies within Simplyhealth will process your information.

### How is your personal data collected?

Direct interactions, you provide data via email correspondence and form submissions

### The data we collect about you

- Name (first and last)
- Email address
- Job Title
- Employer

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data is not considered personal data because it does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. If we combine Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data.

### Purposes for which we will use your personal data

We have set out below, in a table, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note, that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal grounds we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
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To book and administrate Mental Health Aware courses	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Job title</li> <li>• Employer</li> </ul>	Necessary for our legitimate interests (to liaise with MHFA in arranging mental health aware courses)
Asking you to complete a survey or provide a case study	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> <li>• Job title</li> <li>• Employer</li> </ul>	Necessary for our legitimate interests (to develop our products and services, study how our customers use and engage with our products and services)
To make marketing suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>• Name</li> <li>• Email address</li> </ul>	Consent

## Opting out

You can ask us to stop sending you marketing messages at any time by contacting us at [mhaworkshop.enquiries@simplyhealth.co.uk](mailto:mhaworkshop.enquiries@simplyhealth.co.uk)

## Disclosures of your personal data

We may share your personal data with the parties set out below for those purposes set out in table 'Purposes for which we will use your personal data':

Internal Third Parties: Other companies within Simplyhealth and who provide IT and system administration services and undertake leadership reporting.

External Third Parties: Mental Health First Aid England.

## International transfers

Some of our external third parties are based outside the UK or European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the UK or EEA.

Whenever we transfer your personal data out of the UK or EEA, we ensure the same level of protection is afforded to it by ensuring an appropriate safeguard is implemented:

Please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk) if you want further information on the specific mechanism used by us when transferring your personal data out of the UK or EEA.

## Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who

have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

## Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. If you would like more information about how long we will keep your information for, please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

## Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- Request the transfer of your personal data to you or to a third party. Where applicable, we will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent
- Where any automated decision making and profiling has taken place, you have the right to obtain human intervention, express your point of view, and obtain an explanation of the decision and to challenge it.

If you wish to exercise any of the rights set out above, please contact us at [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **Data protection contacts**

If you have any questions, comments, complaints or suggestions regarding any aspect of your personal data or this privacy policy, please contact our Data Protection Officer, [thedataprotectionofficer@simplyhealth.co.uk](mailto:thedataprotectionofficer@simplyhealth.co.uk)

You have a right to make a complaint at any time to your local privacy supervisory authority. Simplyhealth's main establishment is in the UK, where the local supervisory authority is the Information Commissioner's Office (ICO). However, we would appreciate the chance to address your concerns before you approach the ICO, so please contact us in the first instance.