

## Client Privacy Notice

The Swansea Wellbeing Centre (“The Centre”) is committed to respecting the privacy of everyone who uses the services both online and in our building. We want you to understand how we use and protect the personal information that you provide to us, making every effort to ensure that your personal information is processed in a reasonable, fair, open and transparent manner.

The Centre will fully comply with the Data Protection Act 2018 and the UK General Data Protection Regulations. The Centre may collect personal information about you in order to process any referral made by you or on your behalf and to give you the best possible service.

The General Data Protection Regulations (GDPR) sets out six lawful grounds for processing personal data:

- Consent
- Contract
- Legal obligation
- Vital interests
- Public task
- Legitimate interests

It is a requirement under law for us to identify a lawful basis under which we are permitted to process your personal data. At the Centre, we rely on **Legitimate interest** as our main lawful basis for processing of personal data. This means that usually we will only process your data in a way that is proportionate and adequate to allow us to fulfil our legitimate interest in providing wellbeing services to you.

Circumstances where **Consent** may be relied on as a lawful basis

In certain circumstances you may request us to process your data in a way which falls outside of our standard processing activity, to complete a particular action on your behalf. In these circumstances we may rely on the provision of your **Consent** as the lawful basis for us to process your personal data. If this were the case, we would discuss it with you beforehand and you would be asked to sign a form to document your agreement. Your consent would be strictly limited to processing for the purpose of the agreed action and would only be in the manner agreed and as documented between you and The Centre. Once consent has been given, you have the right to retract it at any time; where you communicate to us that you have withdrawn your consent, we are required to stop processing all your personal data in relation to which your consent was given. Please note: withdrawal of consent will not automatically require us to stop processing your personal data for which we have not requested your consent to process (e.g. data which has been collected under the Legitimate Interest lawful basis). Where you give us consent to process your data for a specified purpose, we will reiterate your right to withdraw consent and inform you of how to do this within the consent agreement between you and The Centre.

Circumstances where Legal Obligation may be relied upon as a lawful basis

This lawful basis will only be relied upon in circumstances where processing of personal data is necessary in order to comply with the law.

Circumstances where Vital Interests may be relied upon as a lawful basis

This lawful basis will only be relied upon in circumstances where processing of personal data is necessary in order to protect someone's life.

More information on the operation and application of Lawful Bases can be found on the Information Commissioner's website at: [Does an organisation need my consent? | ICO](#)

## Information we collect

The personal information collected by us will be limited to that which is essential to allow us to provide the support you require and deserve. This includes your name, address, contact details (including your email address and mobile number where you have provided these) alongside any health-related information required for the delivery of services, for example:

- Monitoring forms for all centre projects.
- Email collection for newsletter.
- Open Day information gathering.
- Feedback from community and expression of interest regarding service provision.
- Sign in sheets for centre practitioners.
- Volunteer information sharing handbook.
- We store information on practitioners qualifications, references and where appropriate DBS checks.

In some circumstances, we may process some of your data which is more sensitive in nature and which the Information Commissioner's office defines as Special Category Data. None of your Special Category Data will be processed without first obtaining your **Consent**, as described in the **Consent** section, above. Special Category Data we collect and process will generally be health-related information required for the delivery of services or in order to make our services more inclusive, for example:

- Disability information (such as physical or learning disabilities). Data related to racial/ethnic origins.
- Data concerning health and sex life (such as substance abuse, domestic abuse, mental health, depression, and pregnancy).
- Details of any ancillary support services/agencies being used by you (such as family GP, health advisors, social workers)
- Data relating to diversity and inclusion.

We may also collect information from any individual/agency/practitioner that has referred you to us.

## **How we will use your personal information and who it will be shared with**

There are times when it is appropriate for us to share information about you and your healthcare with others including GPs, NHS Wales, healthcare providers, and Practitioners based at the Centre. We may also need to share your information with non-healthcare organisations, where it is required in compliance with legal duties. Where we share information with non-healthcare organisations (as described above), we always request that they enter into an information sharing agreement to ensure that information we share with them is handled appropriately and complies with relevant legislation.

The information from your referral form will only be used for the purposes that benefit your care and support. We may, on an anonymised basis, use your personal information to demonstrate the impact of our services. Any case study information shared will always be on anonymised basis unless we have further explicit consent from you.

We may use your personal information with the Centre for the specific purposes of statistical analysis and the promotion of our work as well as any reporting requirements for funders who support the organisation. This will be on a pseudo-anonymised basis (meaning that we will take steps to limit the ability to for your personal information to be identified. This will normally include the anonymization of names and full addresses). We may share personal information with law enforcement or other authorities if required by applicable law (including, in line with our Safeguarding Policy).

We use data processors who are third parties based outside of the European Union who provide secure data storage services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct. All data storage and processing outside of the UK will only be done in accordance with the UK GDPR.

We will not share your personal information with any other third party without first obtaining your explicit consent.

## **How long your personal information will be kept**

We will keep your personal information after we have finished providing our support to respond to any questions, complaints or claims made by you or on your behalf, to show that we treated you fairly and/or to keep records required by law. We will not keep the information for longer than necessary. We keep different types of information for different lengths of time.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent your information from being accidentally lost or used or accessed in an unauthorised way.

We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and the Information Commissioner of a suspected data security breach in accordance with our regulatory duty to do so.

## **Your Rights**

You have a number of rights as a data subject, which are explained below. Please be aware that these rights do not apply in all circumstances, but where we can, we'll give you the information that you request.

In order to access the data we hold about you, please make a 'Subject Access Request' (SAR).

### **Creating a SAR**

Either email us at [centre@wellbeingswansea.co.uk](mailto:centre@wellbeingswansea.co.uk) or write to us at:

Swansea Wellbeing Centre  
Walter Road,  
Swansea  
SA1 5PQ

Please provide:

- 1) Your name and address and clearly state what information you would like;
- 2) Identification documents: one which shows your name and signature (e.g. a copy of your passport) and one which shows your name and address (e.g. a copy of a recent bill or bank statement or other official document). We will accept just one identification document if it shows your name, address and signature (e.g. your driving licence). This is to take reasonable steps to confirm your identity before providing you with details of any personal information we may hold about you so that the security of your personal data is not compromised in any way.
- 3) Please note that if your SAR involves the data of another person or you are making a request on behalf of someone else (such as a parent on behalf of their child), we may need identification from these individuals, as well (in some cases) as a signed letter of authority from them confirming that they are happy for you to act on their behalf and for us to release their data to you.

Once we have received your request and identification documents, we will have 30 calendar days to fulfil your request. Where for some (evidenced and legitimate) reason

this will not be possible, for instance due to the data involved being very difficult to separate from the data of another individual, we are permitted by law to take up to an additional 30 calendar days to fulfil your request. Where any such delay is anticipated we will inform you as soon as possible along with details of when we expect to be able to provide you with the requested documentation.

### **Other data subject rights**

Your other rights as a data subject, where applicable, include:

- The right to be informed about our processing of your personal data
- The right to have your personal data corrected if it is inaccurate, and to have incomplete personal data completed
- The right to object to the processing of your personal data
- The right to have your personal data erased (“right to be forgotten”)
- The right to move, copy or transfer your personal data (“data portability”)
- Rights regarding automated decision making, including profiling.

For more details on these rights and how to exercise them, please email us at [centre@wellbeingswansea.co.uk](mailto:centre@wellbeingswansea.co.uk)

If you have any queries about your rights, or believe that they have not been met by the Swansea Wellbeing Centre or anyone carrying out work on behalf of the Centre, please contact our Managing Director by email at [centre@wellbeingswansea.co.uk](mailto:centre@wellbeingswansea.co.uk) or in writing:

Managing Director  
Swansea Wellbeing Centre  
Walter Road,  
Swansea  
SA1 5PQ

### **Complaints Relating to Processing of your Personal Data**

If you have any complaints relating to the processing of your personal data, you also have the right to complain to the relevant Supervisory Authority. In the UK this is the Information Commissioner’s Office (ICO). They can be contacted at:

Information Commissioner’s Office  
Wycliffe House  
Walter Lane  
Wilmslow  
Cheshire  
SK9 5AF

## Marketing Preferences

The Swansea Wellbeing Centre would like to keep you informed about our classes, events and offers. This could be via our email newsletter or through our social media sites.

You will only receive our email newsletter where this has been requested by you. However, if you would like to be removed from our email distribution list then please let us know by emailing us at [centre@wellbeingswansea.co.uk](mailto:centre@wellbeingswansea.co.uk) or write to us at:

Swansea Wellbeing Centre  
Walter Road,  
Swansea  
SA1 5PQ

You have a number of important rights, which you may exercise in relation to your personal information free of charge. 3

The Swansea Wellbeing Centre are members of the ICO Registration number ZB332434. We take advice as a member from the ICO where needed. You have the right to request that we:

- Provide you with a copy of your personal information that we hold;
- Update your personal information where it is out-of-date or incorrect;
- Delete personal information that we hold;
- Restrict the way in which we process your information;
- Transfer your data in a way that is accessible to you;
- Consider any valid objections to our processing of your personal information.

We will respond to your request within 1 calendar month.

For further information on each of these rights, including the circumstances in which they apply, visit the Information Commissioner's Office ("ICO") website at <https://ico.org.uk/forthe-public/>. If you would like to exercise any of your rights, please email, call, or write to us using the details in 'How to contact us' below, let us have enough information to identify you, let us have proof of your identity and address, and let us know the information to which your request relates.

### How to complain

Please report any complaint to the details set out in 'How to contact us' below. We hope we can resolve any query or concern you raise about our use of your information. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority ([www.ico.org.uk](http://www.ico.org.uk)) if you think your data protection rights have been

breached by us. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113 ICO website: <https://www.ico.org.uk>

How to contact us

Please contact us if you have any questions about this Privacy Notice or the information we hold about you as detailed below: Data Protection Officer The Swansea Wellbeing Centre  
Email address: [Centre@wellbeingswansea.co.uk](mailto:Centre@wellbeingswansea.co.uk) Postal Address: Walter Road, Swansea SA1 5PQ Telephone Number: 01792 732071