

Privacy Policy

1 Introduction

Welcome to the Papyrus Prevention of Young Suicide (a registered charity in England and Wales registered charity number 1070896 and company number 03555482) (collectively referred to as "Papyrus", "we", "us" and "our" in this privacy policy) privacy policy.

Papyrus respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

2 Important information and who we are

2.1 Purpose of this privacy policy

This privacy policy aims to give you information on how Papyrus collects and processes your personal data when you visit our website or engage with us in other ways, and about your privacy rights and how the law protects you. This includes any personal data you may provide through our website when you sign up to any newsletters we publish, make an enquiry, or use our services.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

2.2 Controller

Papyrus is the controller and responsible for your personal data. We have appointed a data protection manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact us using the details set out below.

2.3 Contact details

If you have any questions about this privacy policy or our privacy practices, please contact us in the following ways:

Full name of legal entity: Papyrus Prevention of Young Suicide

Email address: dataprotection@Papyrus-uk.org

Postal address: Papyrus Prevention of Young Suicide 2 Bankside, Crosfield Street, Warrington, WA1 1UP

Phone: 0300 102 2444

2.4 Complaint Procedure

If you are unhappy about how we use your data you may raise a complaint with us via the contact details in section 2.3. We will investigate this thoroughly and acknowledge your complaint within 30 days.

You also have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK regulator for data protection issues via their website (www.ico.org.uk) or by calling 0303 123 1113. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

2.5 Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2.6 If you are aged 16 or under

We want to protect the privacy of children aged 16 or under accessing our website and services. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever possible before you provide us with your personal information. Details of all individuals regardless of age will be treated with respect and stored securely as outlined within this policy and, where you are using HopeLine 24/7, our **confidentiality policy**.

2.7 Third-party links

This website may include links to third-party websites, plug-ins and applications. 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 or how they handle your personal data. When you leave our website, we encourage you to read the privacy policy of every website you visit.

3 The data we collect about you

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 may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender. If you are at risk of immediate harm we may ask for your name, age, date of birth, phone number, address and current location and what you are wearing so we can contact the emergency services to get you support.
- **Contact Data** includes physical addresses / location details, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details, taxpayer status and information we need to comply with our regulatory obligations in connection with anti-money laundering legislation and tax legislation.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website or communicate with us.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data: Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us or a transaction which we have arranged for you but we will notify you if this is the case at the time.

We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. **Aggregated Data** could be derived from your personal data but is not considered personal data in law as this data will 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. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

3.1 CCTV

Some of our premises operate CCTV systems, so you may be recorded when you visit them. CCTV is installed for the security of Papyrus staff, volunteers and visitors, and to prevent the loss or damage of charity property. At our Head Office in Warrington this is controlled and operated by Papyrus, but across our regional offices this is not operated by us, so we are not the controller. It will be under the control of the relevant building landlord. CCTV footage will only be viewed when necessary, for example to detect or prevent a crime; and is only stored on a temporary basis, unless required for evidence, with access restrictions in place.

3.2 Special Category Data

We do not, as standard, collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. Provision of this type of personal data is not required to access our services and is completely optional. If you provide us with any information it will be treated as confidential and only accessed by authorised staff members as set out in our **confidentiality policy**.

4 How is your personal data collected?

We use different methods to collect data from and about you including through:

4.1 Direct interactions.

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- make an enquiry
- use HopeLine 24/7
- create an account on our website
- subscribe to our newsletter
- make a donation
- register for a fundraising event
- register for a training course
- give us feedback or contact us

4.2 Automated technologies or interactions (including Cookies).

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. Please see our cookie policy, <https://www.Papyrus-uk.org/cookie-policy-uk/>, for further details.

4.3 Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources where, for example, you are referred to us by someone else or else you enter into a contract with someone we have introduced you to.

5 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

See section 12 to find out more about the types of lawful basis that we will rely on to process your personal data.

We may also use your data, or permit selected third parties to use your data, to provide you with information about services which may be of interest to you and we or they may contact you about these by post or telephone. Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

5.1 Purposes for which we will use your personal data

We have set out below, in a table format, 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. 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 ground 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
To register you as a new user of our services.	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To process orders and deliver our services and functions including: (a) uploading content to our site (b) managing payments (c) Collect any donations made by you (d) to enable us to claim gift aid on eligible donations, or ensure you meet the necessary criteria for fundraising events (e) the provision of training by us for our partners and staff; (f) where we need to protect yours or someone else's life	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) compliance with legal obligation (e.g. around safeguarding)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile (f) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how individuals use our services) (d) compliance with legal obligation (e.g. around safeguarding)

<p>To enable you to partake in an event or draw or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (d) Marketing and Communications</p>	<p>(a) Performance of a contract with you (d) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (e) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of any advertising we serve to you</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (c) Technical</p>	<p>(b) Necessary for our legitimate interests (to study how customers use our services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (f) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for (c) our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>

<p>To make suggestions and recommendations to you services that may be of interest to you</p>	<ul style="list-style-type: none">(a) Identity(b) Contact(c) Technical(d) Usage(e) Profile(b) Marketing and Communications	<p>Necessary for our legitimate interests (to develop our services and grow our business)</p>
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5.2 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

a) Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you as well as events we may be running (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us and you have opted to receive that marketing.

b) Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

c) Opting out

You can ask us or third parties to stop sending you marketing messages at any time or else can use the unsubscribe button on any marketing messages we send.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

5.3 Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6 Disclosures of your personal data

6.1 We may share your personal data with the parties set out below for the purposes set out in the table in section 1 above.

- any payment service providers we use from time-to-time;
- our contractors, sub-contractors and agents who support our supply of services to you;
- any partners with whom we work from time-to-time to offer you access to their goods and services where you opt to use them through our site;
- where permitted by applicable law, with other third parties, for example, insurers, reinsurers, insurance and reinsurance brokers, other intermediaries and agents, appointed representatives, distributors, affinity marketing partners and financial institutions, securities firms and other business partners
- Service Providers who help manage our IT and back office systems, or who provide platforms and portals for administering policies and member details; and /or

In particular:

- When you donate to us via our website your data will be processed and protected by our secure payment provider Blackbaud Merchant Services to keep your data safe.
- Our text to donate platform is operated by Donr who ensure your data is secure.
- If you use third party fundraising platforms like JustGiving or Facebook your information will be securely processed by them and passed onto us to record and acknowledge your donation. It is advisable to check the privacy policy of the relevant platform you use to see how they use your data for their own purposes. Many of these sites also enable donors to donate anonymously, in which case your details will not be shared with Papyrus and we will be unable to acknowledge your donation.
- When making an order through our shop we will also collect information necessary to fulfil your order such as your delivery and billing information. Payments for these orders are processed through PayPal.
- When booking onto a funded training course, your details may be shared with the relevant third-party who are providing the funding.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7 International transfers

As part of the services offered to you through this website, the information which you provide to us may be transferred to countries outside of the United Kingdom and the European Union. This may happen if any of our servers are from time to time located in a country outside the UK or EU.

Countries outside the UK or EU which hold information must also adhere to data protection laws. By submitting your personal data, you are agreeing to this transfer, storing or processing. If we transfer your information outside of the EU in this way, we will take steps to

ensure that lawful and appropriate security measures are taken with the aim of ensuring that your privacy rights continue to be protected as outlined in this Policy.

If you use our services while you are outside the UK or EU, your information may be transferred outside the EU in order to provide you with those services.

8 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.

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

Any sensitive information, such as credit or debit card details, are encrypted and protected by our third-party providers, we do not store any payment details on our own systems.

Non-sensitive details, such as your email addresses, if transmitted normally over the internet or in the post, can never be guaranteed to be 100% secure. As a result, while we strive to protect your security, we cannot guarantee the security of any information you transmit to us and you do at your own risk.

Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given, or where you have chosen, a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

9 Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see section 10 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10 Your legal rights

10.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data, including the following rights:

- **Request access** to your personal data (subject access request). This enables you to receive a copy of the personal data we hold about you.
- **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 access** to your personal 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 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:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.

- 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.
- 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. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **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.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required: You will not have to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. We could refuse to comply with your request in these circumstances.

What we may need from you: We may need to request specific information from you to help us confirm your identity to exercise any of your 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.

Time limit to respond: We try to respond to all legitimate requests within one month. Occasionally it could 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.

11. What's different for kids and teens?

a. Why do we collect information about you in the first place?

We keep information about you so we can:

- Get the right services and information for you;
- Plan and improve our services;
- Keep in touch with you.

b. In this document we explain why and how we collect and use your personal data and or how long. If we need your parent or guardian's permission to access specific content or services then we'll give you clear details and what's needed at the time.

c. We might ask you to tell us your age and sometimes we'll ask to get your parent or guardian's consent.

- d. We might also ask for some details from you, so that we can contact you, other times we may contact your parent or guardian:
- So you can get notification from us;
 - So we can show you more things that may be relevant to you;
 - So you can post comments and upload content to our site.
- e. Sometimes our safeguarding or legal requirements may require that we tell a third party (such as emergency services or your parents) about your activities. This is all to keep you safe.
- f. You've got privacy rights, the same as adults, so get to know what they are. You can:
- Ask us what personal information we hold about you;
 - Ask us to correct or delete your personal information;
 - Tell us to stop using your personal information.

If you're 13 or older, you can do this yourself, but not always. Sometimes we'll be asking for your parent or guardian to do that. If you're under 13 your parent or guardian probably has to do it for you.
