

## Family Support Service Privacy Policy

Welcome to the Ruth Strauss Foundation's privacy policy in relation to the Family Support Service we offer.

The Ruth Strauss Foundation 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 use our Family Support Service and tell you about your privacy rights and how the law protects you.

### 1. Important information and who we are

#### Purpose of this privacy policy

This privacy policy aims to give you information on how The Ruth Strauss Foundation collects and processes your personal data when you use our Family Support Service. Our Family Support Service offers information, support, and guidance to families where a child is facing parental bereavement. We do this through pre-bereavement guidance appointments and providing information and resources on our website <https://ruthstraussfoundation.com/>. If you would like more information about how we use your personal data when you access our website, please see our privacy policy at <https://ruthstraussfoundation.com/privacy-policy/>.

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.

#### Controller

The Ruth Strauss Foundation is the controller of your data and we are responsible for your personal data (collectively referred to as the Ruth Strauss Foundation, "we", "us" or "our" in this privacy policy).

We have appointed a data protection officer (DPO) 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 (see section 9 below), please contact the DPO using the details set out below.

#### Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO on [familysupport@ruthstraussfoundation.com](mailto:familysupport@ruthstraussfoundation.com). You can also write to us at:

The Ruth Strauss Foundation  
For Attention of Family Support Service  
c/o ECB Offices  
Lord's Cricket Ground London  
NW8 8QZ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before

you approach the ICO so please contact us in the first instance.

## 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. 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, marital status, title, date of birth, sex and gender.
- **Contact Data** includes address, email address and telephone numbers, communication preferences, and details of your emergency contacts.
- **Family Data** includes the number of children you have, the names of your children, the ages of your children and details of the family unit (e.g. who makes up the family unit, where they live and with whom).
- **Support Data** includes information around what other organisations are offering support to you, the support you are seeking for yourself and, if applicable, your family, whether you have internet connection and a private space in which we can provide support, your availability for our support, and information you provide in survey responses.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Health Data** includes details of your general practitioner (GP) practice and phone number and details of your mental and physical health of yourself and/or your family (such as who is terminally ill in the family, details of the illness and your/your family's health needs (as far as you wish to share this information with us) and the details of their/your care (e.g. the name of the organisation where they/you are being cared for). Health Data is considered to be a special category of personal data which requires us to ensure that there is a higher level of protection around the processing of this data. Please note that we will only process this type of personal data with either your explicit consent or, if you are providing this information about your partner or another family member, we will only process this special category personal data as set out in section 4 below.

We 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.

## If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of an agreement we have with you, and you fail to

provide that data when requested, we may not be able to perform the agreement we have or are trying to enter into with you (for example, to provide you with our Family Support Service). We will notify you if this is the case at the time.

### 3. How is your personal data collected?

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

- **Direct interactions.** This is the main way that we collect personal data about you. You may give us your Identity, Contact, Family, Support, Marketing & Communications, and Health Data by filling in our web contact form or by corresponding with us by post, phone, email, in person or otherwise. This includes personal data you provide when you:
  - sign up for our Family Support Service;
  - complete our web contact form on our website;
  - communicate with our 'pre-bereavement guidance practitioners (a 'Practitioner');
  - request marketing to be sent to you;
  - give us feedback, respond in a survey or contact us.
- **Third parties.** We may receive personal data about you through referrals from other organisations such as other charities, healthcare organisations or healthcare professionals.
- **Family/partner interactions.** We may collect personal data about you when we speak to your partner or family member as part of their use of our Family Support Service.

### 4. 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 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.

We rely on your consent as a legal basis for processing your Health Data. We will also get your consent before sending third party direct marketing communications to you. You have the right to withdraw consent at any time by contacting us at the email address set out in section 1 above.

Where we process your partner or family member's Health Data, the lawful basis we rely on to process that data is that our processing is for a reason of substantial public interest (under Article 9 of the UK GDPR) specifically that the processing is necessary for the provision of confidential counselling, advice or support (under Part 2, Paragraph 17, Schedule 1 of the Data Protection Act 2018).

### 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.

'Legitimate Interest' means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any

potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

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 assess whether you meet our support criteria and register you as a new user of our Family Support Service	(a) Identity (b) Contact (c) Family (d) Health	(a) Necessary for our legitimate interests (to meet and further our charitable aims) (b) Consent (in relation to your Health Data) (c) Substantial public interest (where the Health Data relates to your partner / family member)
To determine how best to provide support to you	(a) Identity (b) Contact (c) Family (d) Support (e) Health	(a) Necessary for our legitimate interests (to meet and further our charitable aims) (b) Your consent (in relation to your Health Data) (c) Substantial public interest (where the Health Data relates to your partner / family member)
To deliver our Family Support Service to you (predominantly through our Practitioners). This may include, among other things:  (a) arranging meetings with our Practitioners  (b) to ensure we tailor our service to your individual requirements  (c) ensuring we can work safely and responsibly with you and that your GP remains involved in your care, where required	(a) Identity (b) Contact (c) Family (d) Support (e) Health	(a) Necessary for our legitimate interests (to meet and further our charitable aims) (b) Your consent (in relation to your Health Data) (c) Substantial public interest (where the Health Data relates to your partner / family member)

To manage our relationship with you which will include notifying you about changes to our services or privacy policy	(a) Identity (b) Contact (c) Marketing and Communications	Necessary for our legitimate interests (to meet and further our charitable aims)
To improve our Family Support Service. This may include asking you to take a survey.	(a) Identity (b) Contact (c) Support (d) Health (e) Family	(a) Necessary for our legitimate interests (to meet and further our charitable aims)  (b) Your consent (in relation to your Health Data)  (c) Substantial public interest (where the Health Data relates to your partner / family member)
To protect you, your partner and/or your family. This may include us sharing personal data with your GP, other health professionals or the emergency services (such a police or ambulance).	(a) Identity (b) Contact (c) Family (d) Support (e) Health	(a) Necessary for our legitimate interests (to meet and further our charitable aims)  (b) Your consent (in relation to your Health Data)  (c) Substantial public interest (where the Health Data relates to your partner / family member)
To promote the Family Support Service to healthcare professionals and charities and see where it is being used.	(a) Health (b) Family	(a) Necessary for our legitimate interests (to meet and further our charitable aims)  (b) Your consent (in relation to your Health Data)  (c) Substantial public interest (where the Health Data relates to your partner / family member)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Support (d) Family (e) Health	(a) Necessary for our legitimate interests (to meet and further our charitable aims)  (b) Your consent (in relation to your Health Data)  (c) Substantial public interest (where the Health Data relates to your partner / family member)

## **Marketing**

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

### **Promotional offers from us**

We may use your Identity, Contact, Support and Family Data to form a view on what we think you may want or need, or what may be of interest to you. We do this in collaboration with you, discussing your wishes and areas where you consider you need further support. This is how we decide which services may be relevant for you (we call this marketing).

You may receive marketing communications from us if you have requested information from us or used our services and you have not opted out of receiving that marketing.

### **Third-party marketing**

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

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by logging into our website and checking or unchecking relevant boxes to adjust your marketing preferences, by following the opt-out links on any marketing message sent to you, or by contacting us at any time.

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 experience or other transactions.

### **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.

## **5. Disclosures of your personal data**

We may share your personal data with the parties set out below for the purposes set out in the under the heading **'Purposes for which we will use your personal data'** above.

- Our Practitioners and their clinical supervisors (the supervisor will be an appropriately qualified and experienced professional therapist). Our Practitioners and the supervisors are external individuals who will provide you with the Family Support Service. We most commonly share information with them using our customer relations system called Salesforce.
- Our Family Support Team. This includes a Head of Services, Clinical Lead and Programme Co-ordinator

who will oversee the Family Support Service.

- Other external third parties, namely:
  - Service providers, including IT and system administration services, Blayney Partnership and Salesforce.
  - Professional advisers including lawyers, bankers, auditors and insurers.
  - The Charity Commission.
  - Local services which you would like to access, where a referral from us is needed or would be of assistance.
  - Your GP or other healthcare organisation.
  - Emergency services such as the police.
  - Your emergency contact.
  - Any organisation to which we are legally obliged to share personal data with.
- Third parties to whom we may choose to sell, transfer or merge parts of our organisation. Alternatively, we may seek to acquire other organisations or merge with them. If a change happens to our organisation, then the new owners may use your personal data in the same way as set out in this privacy policy.

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.

## **6. International transfers**

We do not transfer your personal data outside the UK other than to Belgium. We transfer your personal data to Belgium because this is where the information you provide to us in our web contact form on our website is stored, through our service provider Blayney Partnership. When we transfer your personal data to Belgium, we ensure that a similar degree of protection is afforded to your data as it would have in the UK, on the basis that Belgium is covered by the EU-wide adequacy regulation that the UK has in place.

## **7. 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.

## **8. 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. This will typically

be a period of 7 years. 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.

In some circumstances you can ask us to delete your data: see section 9 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.

## 9. 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:

- 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 our DPO, as set out in section 1 above.

### **No fee usually required**

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 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 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.

### **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.