

PRIVACY STATEMENT

We are Combat Stress. The UK's leading charity for veterans' mental health. For almost a century, we've helped former servicemen and women deal with trauma-related mental health problems such as anxiety, depression and post-traumatic stress disorder (PTSD).

Today, we provide our life-changing treatment to veterans from every service and every conflict. On the phone and online. In the community and at our specialist centres. When a veteran asks for our help, we develop a programme of treatment and support to meet their individual needs. From an hour a week at a peer support group meeting close to home to our six-week residential PTSD treatment programme at one of our specialist centres, together we work out the right support.

We know that invisible injuries can be just as hard to cope with as physical ones. Our services help veterans cope with the present, tackle the past and take on the future. Some may find using just one of our services will transform their lives, others may need more to start living again. But our expert team will be there to help every step of the way.

At Combat Stress and Combat Stress Trading Ltd we are committed to protecting your privacy. Under the new General Data Protection Regulations, you have a greater say in what we do with your information. This is our Privacy Statement which will tell you how we deal with your information and how you can control what we do with it.

In this statement we refer to both information and data in the same context.

To read what we do with your information in our Fundraising and Communications departments please see their additional Privacy Policy on our website.

Should you have any questions about this statement or wish to make a complaint please contact:

The Data Protection Officer
Combat Stress
Tyrwhitt House
Oaklawn Road
Leatherhead
Surrey KT22 0BX
01372 587000
dpo@combatstress.org.uk

If you have already made a complaint to us about how we treat your data, but you still have not had a resolution and you want to take your complaint further, you should contact the Information Commissioner's Office.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF
Tel: 0303 123 1113

What information we collect

- We collect personal information that may include date of birth, email address, postal address, telephone number and bank details.
- We collect sensitive personal information such as information about your health if this is required for the purpose you have contacted Combat Stress.
- We also collect personal information using Cookies when you use our website. Cookies collect data about things like which services, events or facilities are of most interest to you, which pages users visit most often and which items you looked at in our online shop, as well as non-specific geographical information. We may use this information to personalise the way our websites are presented when users visit them; to make improvements to our websites and to ensure we provide the best service for users.
- We also use cookies on our website. Wherever possible we use aggregated or anonymous information which does not identify individual visitors to our websites. For full details please see our Cookie policy.

Why we collect information

We collect information to deal with you as a stakeholder or a supporter, an employee, or if you are one of the veterans we help. We only ask for the information we need at appropriate times we need it.

Who collects the information

- Our Fundraising and Communications teams, through donations; sales; volunteering and sponsorship.
- Our Clinical services and Research teams, through information collected to provide medical care services and treatment.
- Our Finance and Human Resources teams, through the contract you sign with us if you are an employee or contractor.
- Credit/debit card details may be collected by the partner organisations we work with, for example 'Shopify', 'Just Giving', 'Virgin Money' regarding website sales and donations. Please visit their websites to see their privacy policies.

How we collect information

We collect information about you when you:

- use our website
- contact us about our services
- donate to us or fundraise for us
- buy from our online shop
- volunteer for us
- work for us, or
- use our clinical services

We will inform you if we use your information in any other way than the original reasons we collected it.

Who we share information with

We only share information that is required when:

- you are in treatment, when it becomes our duty of care to share the information to benefit you.
- we are legally required to do so, e.g. by a law enforcement agency, legitimately exercising a power, or if compelled by an order of the Court.
- we believe it is necessary to protect or defend our rights, property or the personal safety of our people or visitors to our premises or website.
- we are working with carefully-selected partners that are carrying out work on our behalf.

- we work with trusted business partners outside the EU. In this instance we will only transfer to companies who comply with EU data protection regulations and participate in a relevant Privacy Shield Framework for that country.

We will never sell your information to anyone.

How we use information

What we collect and why we use it	Legal basis for processing
Personal information to allow us to provide 'Help Line' services to our veterans	We will use legitimate interest based on the need to provide first line help and support
Sensitive Medical information for treatment of our veterans	We will ask for consent for treatment and handle the information respectfully and safely, according to the Caldicott Principles
Personal information to research our services	We will ask for consent
Personal information to inform you of appeals and newsletters	We will ask for consent
Website usage information (cookies) to understand how our service is used and improvement we can make	We will use legitimate interest, via cookies and other technologies. You can find our cookie policy on our website, which will tell you how we do this
Personal banking details if you donate directly to us or buy goods from our treatment centres to complete the transaction	We will use legitimate interest otherwise payment would not happen
Personal and Sensitive information to allow us to administer, assist and support our fundraisers	We will use legitimate interest
Personal and Sensitive information to carry out the duties of an employer for both HR and Finance.	We will use contractual processing and legitimate interest
Personal and Sensitive information to carry out work with us if you are a contractor to track our contract obligations	We will use contractual processing

Right to access

You have the right to ask for all or part of the information we keep about you.

- We will ensure that it is given to you within 30 days.
- If we hold a lot of your information this may take some time to copy and send out to you, if this is the case we will contact you to request an extension.
- We will ask your permission if another person or organisation asks for your information.
- We will make sure that your information is secure when it is sent out to you, in a form that you request.

Right in relation to automated decision making and profiling

- We use profiling and screening techniques in our Income Generation department, this includes some automated techniques, such as postcode segmentation, to ensure communications are relevant and timely, and to provide an improved experience for our supporters.
- You have a right to object to profiling and automated decision making.

Right to restrict or object to how your information is used

- You have the right to object to any information that you feel is incorrect or that we should not hold on you.
- You have the right to request the restriction or suppression of any information we hold on you.
- You can do this by contacting us on the details above either verbally or in writing.

Right to change your information if we have it wrong

- You have the right to change the information we hold on you if you feel that it is incorrect. We will make sure that your information is as accurate as possible.
- You can do this by contacting us on the details above either verbally or in writing.

Withdrawing consent

- You can at any time withdraw your consent for us to further process your data if your consent was asked for.
- You can do this by contacting us via email, telephone, post or if you meet with us face to face. We will confirm in writing any request for withdrawal of consent.

Special Category Data (information within health records)

- Special Category data at Combat Stress relates to information on medical diagnosis; provision of health care and the management of health services.
- If you receive treatment from us the Special Category data we collect is then governed by the consent under Human Rights Act 1998 and the Caldicott Principles, this means we have a duty to share your information with other medical professionals who are involved in your care.

Right to erasure or 'be forgotten'

- Combat Stress will adhere to this right which allows you to request deletion or removal of your Personal information where it is no longer necessary for the purpose which it was originally collected.

When does the Right to erasure not apply?

- As our Special Category data is being processed by or under the responsibility of a professional who is subject to a legal obligation of professional confidentiality (e.g. a health professional) the right to erasure will not apply.

How we dispose of personal and sensitive information

- We abide by the Records Management Code of Practice for Health and Social Care put in place in 2016.
- We will ensure that medical information is kept up to date and disposed of under governmental guidelines.
- We will manage retention of all data against national retention guidelines.
- All our confidential information is shredded on site by a reputable company.

How we secure data

- We will make every effort to ensure your data is relevant and that only those who need it are those who see it.
- We will also make every effort to ensure our systems are secure enough to keep your information safe.
- We are registered with the Information Commissions Office and abide by their code of conduct in dealing with your information.
- We will ensure that our practices have data protection at their core and we will make sure we practice 'privacy by design', making sure any risks to the security of your data are addressed in all our practices.

How we are accountable for the data we keep

We will ensure that the Charity and all its staff:

- Adhere to our policies; relevant codes of conduct and certification schemes
- Demonstrate compliance to the regulatory bodies of Care Quality Commission; Information Commissions Office; Care Inspectorate; National Data Guardians.

Children's data

- Combat Stress defines a child as a person under the age of 18 years and we do not intentionally request donations, subscriptions or product orders from this age group.
- Information on staff; fundraisers; volunteers or stakeholders, if under the age of 18 years, will be kept with the permission of their parent or legal guardian.