

PURPLE INITIATIVE'S DATA PROTECTION (PRIVACY) POLICY

General Statement of purposes

The primary purposes of the Purple Initiative micro-site are currently to focus on inviting Allied Health and Care Practitioners and other potential stake holders to:

- i) complete an embedded questionnaire
- ii) to declare their interest in our project
- ii) to authorise our board to quote their details in support of future funding applications **and**
- iv) to maintain contact with signatories for periodic consultation and information purposes.

This Data Protection Policy explains the information we collect about you on this website and the steps we take to ensure your information is kept secure and confidential.

We do not knowingly collect or store any personal information about children under the age of 16. **“When fully operational, we plan to have links with organizations who specialize in offering support to the children of Service and Ex- Service families.**

Please read the Data Protection Policy carefully. If you use our site, complete the questionnaire or provide us with your contact details, then you will be regarded as having read and accepted its principles and allow us to use your details in ways set out in this policy. If you don't wish to be bound by what you read below, you are advised not to use our site.

If you have any queries relating to our use of your personal information or any other related data protection questions, please contact June Ross - 07815611705/purpleinitiative@gmail.com marked FAO June Ross

At present Executive Founder, June Ross, is functioning as Data Controller. She will endeavor to ensure that all personal data is processed in compliance with this Policy, the Principles of the Data Protection Act 1998 and The General Data Protection Regulation (GDPR Regulation (EU) 2016/679) adopted 27 April 2016 to be applied from 25th May 2018

The Principles of the policy

Purple Initiative shall comply with the Data Protection principles contained in the legislation to ensure all data is:-

- Fairly and lawfully processed in a transparent manner.
- Processed for a legitimate purpose.
- Adequate, relevant and not excessive.
- Accurate and up to date.
- Not kept for longer than necessary.
- Processed in accordance with the data subject's rights.
- Processed securely.

The policy contains answers to the following questions:

- What information do we collect?
- How do we use the information we collect?
- Why do we process your personal information?
- Who do we share your personal information with?
- How can you amend your preferences?
- What are your personal data rights?
- How long do we keep your personal information?
- What are Subject Access Requests?
- Does this site use cookies?
- What if you follow links on our website?
- How secure is your data and where is it held?
- When was this policy updated?

What information do we collect?

We may collect the following personal information about you (**NB:** we do not collect any sensitive personal information, like ethnic origin, political opinions, religious or philosophical beliefs)

1 Your email address

We collect your email address when you register to receive our email updates and hold it in our email service provider, Gmail and Google Docs (cf: <https://policies.google.com/privacy> **I have changed the link - last one discontinued**). We send occasional updates of our activities including progress on the development of Purple Initiative. If you wish to stop receiving our emails, you can do so at any time by contacting our Data Controller: June Ross - 07815611705/purpleinitative@gmail.com FAO June Ross **We will not share your email address in any other way without consultation when you register your interest. However, your name and profession may be quoted in our applications for funding. We will use the function 'bcc' for group emails - Bcc means blind carbon copy. For emailing, you use Cc when you want to copy others publicly, and Bcc when you want to do it privately. Any recipients on the Bcc line of an email are not visible to others on the email.**

2 Your IP address

We will NOT be collecting your IP address via Google Analytics to generate aggregated, anonymised data for the purposes of internal reporting, insight and analysis, enabling us to improve our site, the services we offer and search results for our site at this stage nor in the future unless with your explicit consent.

Google Analytics gives us anonymous, sampled data about your interactions with our website, such as pages visited, how long you spent on the site, the website from which you came to visit our site, and your location provided by your IP address. **NB: Can you check this out with Jamie, Nigel? I am still a little put out that he told us not to worry about data security when we raised it with him in the discussions in Feb 2017 about updating the site.... Any queries from me are likely to sound a little sharp.**

How do we use the information we collect?

We may use your personal information:

1. for research, such as analysing how visitors use our website and therefore what content we should put on it.

2. to communicate with you by email if you have signed up for that, including sending you articles and information about our services which we think may be of interest to you. If you agree, we will contact you by email or by other electronic means such as via social media about new service launches, useful links and opportunities to participate in market research. We will also periodically seek your opinion regarding developments within Purple Initiative which may be relevant to you.
3. to advertise to you **regarding activity on** third party websites, such as Facebook and LinkedIn.

4. We will store the personal information you provide on G Docs - (cf: <https://policies.google.com/privacy>) for now but may use it to pre-populate fields, in the future, on the Mailchimp preference centre to make it easier to update your details but will seek your explicit consent to do so.

Why do we process your personal information?

We will only collect and use your personal information in accordance with the data protection laws outlined on the second page of this policy. Our grounds for processing your personal information are as follows:

1. **Consent** We will usually only collect and process your personal information if you have given your consent for us to do so, for example, we will only send you certain marketing emails and process any information about you if we have your explicit consent.

2. **Legitimate Interests** – we may use and process some of your personal information where we have sensible and legitimate business grounds for doing so. Under European privacy laws there is a concept of “legitimate interests” as a justification for processing your personal information.

From May 2018, you have a right to object to our use of your personal information for these legitimate interests including where we may use your personal information to create a profile to inform customer demographics (ie -The statistical characteristics of human populations such as geographic location). We will seek your explicit consent before processing your personal information in this way. Please contact our Data Controller if you

have any concerns: June Ross - 07815611705/purpleinitaitive@gmail.com
FAO June Ross

Who do we share your personal information with?

We share your personal information with the organisations who deliver services on our behalf.

Those are:

Google including Gmail – Google run Google Analytics, and they use your IP address to generate aggregated, anonymised data for the purposes of internal reporting, insight and analysis of how visitors use our website. This enables us to improve our site, the services we offer and search results for our site.

Mailchimp – Mailchimp may provide our email marketing service as Purple Initiative's network grows when we may need to use their service to store your email address and any other information you have provided when signing up to our emails, such your name and your job title. View their privacy policy here: <https://mailchimp.com/legal/privacy/>

Facebook – we occasionally use Facebook to advertise our Purple Initiative page to create disseminate information relevant to the Armed Forces Community and for advertising campaigns. You may prefer to **access** our closed group PI4AHP's. This group currently has a 'secret' status. Please contact June Ross regarding membership of this group.

June Ross - 07815611705/purpleinitaitive@gmail.com FAO June Ross.

The personal information you enter when registering on our site or that we collect when you use our site is confidential and except in the circumstances mentioned below, we will not disclose it to any third party.

We may, exceptionally, be required to disclose your personal information to a third party in the following circumstances:

- If required or permitted to do so by law;
- If required to do so by any court, the Financial Conduct Authority or any other applicable regulatory, compliance, governmental or law enforcement agency;
- If necessary in connection with legal proceedings or potential legal proceedings;
- If ownership of all or part of our site is transferred, in which case any purchaser would only be entitled to use that information in a way consistent with this Privacy Information Notice

How can you amend your preferences?

Any email communications we send you will include clear and concise instructions to follow should you wish to unsubscribe at any time.

You may also amend your email preferences via the link received in emails or by emailing Data Controller: June Ross - 07815611705/
purpleinitative@gmail.com FAO June Ross

How long do we keep your personal information?

Unless a longer retention period is required or permitted by law, we will only hold your personal information on our systems for the period necessary to fulfill the purposes outlined in this Privacy Policy or until you request it is deleted.

If, having registered for email updates, you do not open them for one year (which indicates you no longer want to read or receive our emails), we may contact you to ensure you're still happy to receive communications from us. If you do unsubscribe, we will retain your data only to ensure you do not receive further communications from us.

What are your personal data rights?

You have certain rights under existing data protection legislation including the right to request a copy of the personal information we hold about you, if you request it from us in writing.

From May 2018 you have the following rights:

- (i) Right to access: the right to request copies of your personal information from us (see the below section called ‘Subject Access Requests’);
- (ii) Right to correct: the right to have your personal information rectified if it is inaccurate, incomplete or requires updating;
- (iii) Right to erase: the right to request that we delete or remove your personal information from our systems;
- (iv) Right to restrict our use of your information: the right to ‘block’ us from using your personal information or limit the way in which we can use it;
- (v) Right to data portability: the right to request that we move, copy or transfer your personal information;
- (vi) Right to object: the right to object to our use of your personal information including where we use it for our legitimate interests or where we use your personal information to carry out profiling to inform our market research and customer demographics.

To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact our Data Controller- June Ross - 07815611705/purpleinitaitive@gmail.com FAO June Ross

If you are not satisfied with the way any complaint you make in relation to your personal information is handled by us, then you may be able to refer your complaint to the relevant data protection regulator which in the UK is the **Information Commissioner’s Office** <https://ico.org.uk/>

This Privacy Policy shall be governed and construed in all respects in accordance with the laws of the United Kingdom.

What are Subject Access Requests?

Under data protection legislation, you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. We will use reasonable efforts to supply, correct or delete personal information about you on our files. Information must be provided by us without delay and at the latest within one month of receipt.

Please address requests and questions about this to us at 07815611705/ purpleinitaitive@gmail.com FAO June Ross

Cookies

A cookie is a very small text file placed on your computer or device. Cookies help us to:

1. understand browsing habits on our website
2. understand the number of visitors to our website, where they came from and the pages they visited

NB - We don't use cookies to identify any individual user of our site.

Cookies can be used for advertising purposes, for the essential running of the site, analytics and social media.

These cookies are currently on

Advertising:

- Facebook Custom Audience
- Facebook Pixel

Essential:

- Google Tag Manager

Site Analytics:

- Google Analytics
- Visual Website Optimizer

Social Media

- Facebook Connect
- Google+ Platform

These cookies collect information about how you browse our website, such as what pages you visit and how long you spent on them, and stores it on their own servers.

We may then use this data, as Purple Initiative develops, to serve you ads on other social media platforms, serve different versions of our website to test which content is more effective, and analyse our website content to see how useful website visitors find it.

NB: If you want to block the use of cookies on your browser, you can find out how to do that here. [Safari for macOS Sierra: Manage cookies and website ... - Apple Support](#) **OR** <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>

What if you follow links on our website?

Our site contains links to third party websites eg Twitter <https://twitter.com/privacy> and Facebook <https://www.facebook.com/business/gdpr> that are

not subject to this Privacy Policy. We recommend you read the privacy policy of any websites you visit.

How secure is your data and where is it held?

Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation.

It might sometimes be necessary for us to transfer your personal information outside of the European Economic Area (EEA) to locations that may not provide the same level of protection as the UK.

However, we will only transfer your personal information out of the EEA if we have put in place appropriate safeguards and protections as stated under UK law, for example, by the use of a data-transfer agreement incorporating certain standard model protection clauses.

We have strong processes to keep the information you disclose to us secure. However, we can't absolutely guarantee its security. By using our site, you accept the inherent risks of providing information online and will not hold us responsible for any breach of security.

When was this policy updated?

We reserve the right to amend or modify this Privacy Policy at any time but any changes will be published on the website. The date of the most recent revision will appear at the end of this page. If we make significant changes to this policy, we may also notify you by other means such as sending an email.

Where required by law we will obtain your consent to make these changes. If you do not agree with any changes, please contact June Ross - 07815611705/purpleinitative@gmail.com FAO June Ross

Last revised:	14th September	2018
Effective as of:	14th September	2018