

Privacy Notice

Access to your information (subject access request) and correction

A subject access request is your right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us.

The best way to do so is to complete the online form here below – this should ensure that we get exactly the information we need to process your request as smoothly and efficiently as possible.

[Subject Access Request form](#)

If you prefer, you can make your subject access request in person, by phone or in writing – Contact us. We will respond to your request within one calendar month of receiving confirmation of your ID and any other information we may need to process the request.

Correction

We want to make sure your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Information we collect about you when you use our website

Invictus Wellbeing, as a Data Controller, is bound by the requirements of the UK General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

You agree that we are entitled to obtain, use and process the information you provide to us through using this website (<https://www.invictuswellbeing.com>) including:

- Information that you provide by filling in forms on the website
- Details of any donations or job applications that you make
- Details of your visits to this website and the resources that you access
- Website usage information collected using cookies - for more information, please see our cookie policy
- For submitting forms on our website, we use third-party software providers for automated data collection and processing purposes. They will not use your data for any purposes and will only hold the data in line with our policy on data retention.

Analytics

We use Google Analytics to store information about how visitors use our website so that we may make improvements and give visitors a better user experience.

Google Analytics is a third-party information storage system that records information about the pages you visit, the length of time you were on specific pages and the website in general, how you arrived at the site and what you clicked on when you were there. These cookies do not store any

personal information about you and we do not share the data. For more information please see Google's privacy policy.

IP addresses

An IP or Internet Protocol address is a unique numerical address assigned to a computer as it logs on to the internet. This does not give Invictus Wellbeing access to any personal identifiable information and we do not seek such information. Your IP address is logged when visiting our site, but our analytic software only uses this information to track how many visitors we have from particular regions.

How we use the information about you and why

At Invictus Wellbeing we take your privacy seriously. We will only use information obtained through the website subject to data protection legislation and our duty of confidentiality.

For business-to-business clients and contacts, and for business-to-consumer clients and contacts, our lawful reason for processing your personal information will be 'legitimate interest' in furtherance of our charitable aims. Under 'legitimate interest' we can process your personal information if we have a genuine and legitimate reason and we are not harming any of your rights and interests.

We collect information on our website to process your enquiry, give advice or information where this is sought, and improve our services. If you agree, we will also use this information to share updates with you about our services which we believe may be of interest to you.

We will not share your information for marketing purposes.

When we use third-party service providers, we disclose only the personal information that is necessary to deliver the services and we have contracts in place that require them to keep your information secure and not to use it for their own direct marketing purposes.

Transfers

By submitting your personal data, you are agreeing to us transferring, storing and processing your data. As part of the services offered to you, the information which you give to us will only be hosted within the UK – European Economic Area (EEA), a country deemed adequate by the European Commission, or in the US where covered by Privacy Shield.

Security precautions in place about data collected

When you give us personal information via our website, we take steps to make sure that it is treated securely. Any sensitive information is encrypted and protected with Secure Sockets Layer (SSL). When you are on a secure page, a padlock icon will appear in your web browser.

Email cannot be guaranteed to be 100% secure. As a result, whilst we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so 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 that enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Profiling

We may analyse your personal information to create a profile of your interests and preferences so that we can contact you with information relevant to you. We may make use of extra information about you when it is available from external sources to help us do this effectively. We may also use your personal information to detect and cut fraud and credit risk.

Marketing

If you have consented to receive marketing we would like to send you information about our services which may be of interest to you. You may opt out at any point:

- by using the unsubscribe link in any marketing email we have sent you or
- by asking us to stop contacting you for marketing purposes

How long will we hold your data for?

We will hold your data for a period of 5 years with a review every 2.5 years. You will have the opportunity to opt out or update or delete data at any point should you need to do so and details are set out in this policy as to how to do that.

Objections to processing of personal data

It is your right to lodge an objection to the processing of your personal data if you feel there are 'grounds relating to your particular situation'. The only reasons we will be able to deny your request is if we can show compelling legitimate grounds for the processing, which override your interest, rights and freedoms, or the processing is for the establishment, exercise or defence of a legal claim.

Data portability

It is your right to receive the personal data which you have given to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to another controller without delay from the current controller if:

- the processing is based on consent or on a contract, and
- the processing is carried out by automated means

Your Right to be Forgotten

Should you wish us to completely delete all information that we hold about you please contact us using the details at the end of this policy.

National Data Opt-Out

Invictus Wellbeing reviews all of our data processing on an annual basis to assess if the national data opt-out applies. This is recorded in our Record of Processing Activities. All new processing is assessed to see if the national data opt-out applies.

At this time, we do not share any data for planning or research purposes for which the national data opt-out would apply. We review all of the confidential patient information we process on an annual basis to see if this is used for research and planning purposes. If it is, then individuals can decide to stop their information being shared for this purpose. You can find out more information at <https://www.nhs.uk/your-nhs-data-matters>

Other websites

Our website may contain links to other websites. This privacy policy applies only to this website, so when linking to other websites you should read their own privacy policies.

Complaints

If you feel that your personal data has been processed in a way that does not meet the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then tell you of the progress and outcome of your complaint. The supervisory authority in the UK is the Information Commissioner's Office (ICO).

Changes to our Privacy policy

We keep our Privacy policy under regular review and we will place any updates on this web page.

How to contact us

Please contact us if you have any questions about our Privacy policy or information we hold about you:

Data Protection Officer: Christina Solomi

Email: christina.solomi@invictuswellbeing.com

Data Controller: Invictus Wellbeing (Invictus Wellbeing Foundation CIO)

Address: Invictus Wellbeing, E Mill, Dean Clough Mills, Halifax, West Yorkshire, HX3 5AX

Glossary of terms

Business-to-business

A transaction between two businesses such as Invictus Wellbeing (Invictus Wellbeing Foundation CIO) and a PLC, LTD or Limited Company; an LLP incorporated partnership; incorporated trust or foundation, local authority or government institution.

Business-to-consumer

A transaction between a business such as Invictus Wellbeing (Invictus Wellbeing Foundation CIO) and an individual such as a private client, member of the public, sole trader or an unincorporated partnership, trust or foundation.

Data Controller

For general data protection regulation purposes, the Data Controller is the person or organisation who decides the purposes for which and the way in which any personal data is processed. In this instance the Data Controller is Invictus Wellbeing (Invictus Wellbeing Wellbeing Limited).

Data processing

Data processing is any operation or set of operations performed upon personal data, or sets of it, be it by automated systems or not. Examples of data processing explicitly listed in the text of the GDPR are: collection, recording, organising, structuring, storing, adapting, altering, retrieving, consulting, using, disclosing by transmission, disseminating or making available, aligning or combining, restricting, erasure or destruction.

Data Processor

A Data Processor is a person or organisation which processes personal data for the controller.

Personal data

Personal data relates to any information about a natural person that makes you identifiable, which may include (but is not limited to):

Names and contact information – e.g. emails and telephone numbers

- National insurance number
- NHS number
- Sensitive personal data

Sensitive personal data refers to the above but includes genetic data and biometric data. For example:

- Medical conditions
- Religious or philosophical beliefs and political opinions
- Racial or ethnic origin
- Convictions
- Biometric data (e.g. photo in an electronic passport)