



Valuing and supporting  
lived experience of  
mental health problems  
in mental health professionals

## PRIVACY POLICY – SEPTEMBER 2020

The Data Protection Act 1998 and General Data Protection Regulation 2018 set out the framework for data protection law in the UK. This document explains how in2gr8mentalhealth Ltd, will use any personal data collected about you, as a past, present, or future client, or when using the website, in line with the The General Data Protection Regulation (GDPR). This privacy policy should be read alongside and in addition to our Terms and Conditions, which can be found at [www.in2gr8mentalhealth.com](http://www.in2gr8mentalhealth.com). **Please read this privacy policy carefully.**

At in2gr8mentalhealth we are committed to protecting your privacy in accordance with the Data Protection Act and the GDPR 2018. We will not use any information we may hold about you for any purpose other than that for which it was collected.

### Definitions and interpretation

1. In this privacy policy, the following definitions are used:

<b>Data</b>	collectively all information that you submit to in2gr8mentalhealth Ltd via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;
<b>Cookies</b>	a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below ( <b>Cookies</b> );
<b>Data Protection Laws</b>	any applicable law relating to the processing of personal Data, including but not limited to the Directive 96/46/EC (Data Protection Directive) or the GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;
<b>GDPR</b>	the General Data Protection Regulation (EU) 2016/679;
<b>in2gr8mentalhealth Ltd, we or us</b>	in2gr8mentalhealth Ltd, a company incorporated in England and Wales with



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## Privacy Policy

	registered number 12611290 whose registered office is at 20-22 Wenlock Road, London, N1 7GU;
<b>UK and EU Cookie Law</b>	the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011;
<b>User or you</b>	any third party that accesses the Website and is not either (i) employed by in2gr8mentalhealth Ltd and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to in2gr8mentalhealth Ltd and accessing the Website in connection with the provision of such services; and
<b>Website</b>	the website that you are currently using, <a href="http://www.in2gr8mentalhealth.com">www.in2gr8mentalhealth.com</a> , and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:
  - a. The singular includes the plural and vice versa;
  - b. References to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices in this privacy policy;
  - c. A reference to a person includes firms, companies, government entities, trusts and partnerships;
  - d. “including” is understood to mean “including without limitation”;
  - e. Reference to any statutory provision includes any modification or amendment of it;
  - f. The headings and sub-headings do not form part of this privacy policy.

### Scope of this privacy policy

3. This privacy policy applies only to the actions of in2gr8mentalhealth Ltd and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.
4. For purposes of the applicable Data Protection Laws, in2gr8mentalhealth Ltd is the "data controller". This means that in2gr8mentalhealth Ltd determines the purposes for which, and the manner in which, your Data is processed.

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### **Data collected**

5. We may collect the following Data, which includes personal Data, from you:
  - a. name;
  - b. contact Information such as email addresses and telephone numbers;
  - c. financial information such as credit / debit card numbers;
  - d. email address;

in each case, in accordance with this privacy policy.

### **How we collect Data**

6. We collect Data in the following ways:
  - a. data is given to us by you ; and
  - b. data is collected automatically.

### **Data that is given to us by you**

7. in2gr8mentalhealth Ltd will collect your Data in a number of ways, for example:
  - a. when you contact us through the Website, by telephone, post, e-mail or through any other means;
  - b. when you register with us and set up an account to receive our products/services;
  - c. when you complete surveys that we use for research purposes (although you are not obliged to respond to them);
  - d. when you make payments to us, through this Website or otherwise;
  - e. when you use our services;

in each case, in accordance with this privacy policy.

### **Data that is collected automatically**

8. To the extent that you access the Website, we will collect your Data automatically, for example:
  - a. we automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content.
  - b. we will collect your Data automatically via cookies, in line with the cookie settings on your browser. For more information about cookies, and how we use them on the Website, see the section below, headed "Cookies".



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mental health problems  
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### Data collected during the mentoring process

9. If you decide to engage in a mentoring contract with us, basic personal information will be collected (e.g. your name and contact number or email) for contact and identification purposes.
10. During the process of mentoring, we will collect personal data about you, which might include personal and sensitive details about your life, depending on what you decide to share during the mentoring sessions. Anonymised notes will be taken during the session to ensure that we have an accurate record of our discussions, in order to provide you with an appropriate and adequate service.
11. We will record all contacts that you have with in2gr8mentalhealth Ltd and your assigned mentor. This will include telephone, email and letter contacts and all documentation associated with your contact (e.g. mentorship agreement). This data is used solely for the delivery of our services to you, for insurance purposes and to ensure that we meet our professional and legal obligations.

### Data collected whilst using the in2gr8mentalhealth forum

12. Our forum is provided through a hosting platform called Tribe. in2gr8mentalhealth is not responsible for the processing of data by tribe. You can find the Tribe privacy policy at the following link: <https://tribe.so/privacy-policy>

### Confidentiality

13. Personal data will be kept confidential between you and in2gr8mentalhealth Ltd.
14. If you access our mentoring service, the data shared during the process of mentoring will be kept confidential between you and your mentor. This data will not be shared with other members of the board at In2gr8mentalhealth Ltd and will not be routinely shared with any third party without your explicit consent.
15. There are some situations when data will have to be shared with a third party:
  - a. If there are any legal proceedings in place or a court order that might require in2gr8mentalhealth Ltd to share records. The records we keep are not suitable to be used as evidence in legal proceedings and in2gr8mentalhealth Ltd therefore reserves the right to resist legal requests to produce the records in court. We do this in order to protect the duty of confidentiality of our clients.
  - b. In exceptional circumstances, we may need to share personal information with relevant authorities, without your explicit consent:
    - i. If a mentor feels you or someone else is at risk of significant harm. The mentor will always seek to discuss this with you before disclosing any information to a third party. However, if the risk is imminent, the mentor



Valuing and supporting  
lived experience of  
mental health problems  
in mental health professionals

## Privacy Policy

may not be able to discuss this with you before sharing information with a third party. Mentors have a duty of care for you and members of the public. If there is cause for concern for your safety or the safety of someone else (e.g. someone close to you or a member of the public), the mentor may seek consultation with another professional, such as your GP the NHS or other statutory services.

- ii. If there is a court order in place, concerns over child protection and information regarding fraud, drug trafficking, acts of terrorism and other unlawful acts. in2gr8mentalhealth Ltd have a legal obligation to report this to authorities.

16. We will attempt to discuss any disclosures with you prior to any disclosure. However, there may be occasions when we will be unable to discuss the disclosure with you.

### The lawful basis for processing your data

17. In order to provide services at in2gr8mentalhealth Ltd, it is necessary for us to process your personal data. Under the GDPR it is necessary to identify a lawful basis for processing this information. The lawful basis in this case is **consent** or that it is in our **legitimate interest** to do so.
18. In addition, there may also be occasions when the processing of your information may be required due to a **legal obligation**, for in2gr8mentalhealth Ltd to be able to comply with the law, for example in the case of a litigation claim or when there is a court order.
19. The data collected about you may include special category data (for example data concerning your health, sexual orientation). We may be required to process this data for the purpose of providing you with certain services (e.g. in the case of mentoring).
20. There may be occasions when it may also be necessary for in2gr8mentalhealth Ltd to process your personal and special category data due to **vital interests**, in order to protect your life or the life of another adult or child. We will make every attempt to discuss this with you and gain your consent. However, there may be occasions when you are physically or legally unable to provide consent.

### How in2gr8mentalhealth Ltd will process your personal information

21. We will only use your personal information to provide the services you have requested.
22. Your data may also be used for the purpose of statistics (for example, in reviewing the number of enquiries we have received in a year – this will not be shared with third parties).
23. If you do not provide the personal information required, as outlined above, we may be unable to provide a service for you.
24. in2gr8mentalhealth Ltd will ensure that your personal information is stored securely and confidentially. Your personal data will be stored either electronically, using password protection, or in paper format in a locked cabinet.

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25. Your personal data will be stored with the aim to ensure effective communication for the duration of our contract of engagement relating to the services we provide. It will be stored and used in line with the General Data Protection Regulations (GDPR) 2018 and the Data Protection Act.

### Data retention

26. Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfil the purposes outlined in this privacy policy or until you request that the Data be deleted.
27. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes.

### Your rights

28. You have the following rights in relation to your Data:
- a. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.
  - b. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.
  - c. **Right to erase** - the right to request that we delete or remove your Data from our systems.
  - d. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.
  - e. **Right to data portability** - the right to request that we move, copy or transfer your Data.
  - f. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.
29. To make enquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: [contact@in2gr8mentalhealth.com](mailto:contact@in2gr8mentalhealth.com).
30. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at <https://ico.org.uk/>.
31. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.



Valuing and supporting  
lived experience of  
mental health problems  
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### How we ensure the security of personal information

32. Paper notes / records will be stored in a locked filing cabinet.
33. Electronic records (e.g. reports / letters) are stored on a secure storage system. All documents will be password protected and passwords will be changed at regular intervals.
34. Any email correspondence or correspondence via the website will also be stored.
35. Your contact details (name, mobile number and email address) will be stored on company mobile phones. All mobile phones used are encrypted and password protected for extra security.
36. At in2gr8mentalhealth Ltd we take your privacy very seriously. All the data we process is held in the United Kingdom. in2gr8mentalhealth Ltd does not store personal data outside of the United Kingdom.
37. All data storage services we use for the purpose of our business are fully GDPR compliant. Malware and antivirus protection is installed on all computers used for business purposes.
38. Mobile devices are encrypted and protected with a passcode/fingerprint scanner and antivirus software is installed on all mobile devices.
39. If you require personal / sensitive information to be shared with you or third party, this will usually be done electronically:
  - a. Sensitive data will be sent to clients or third part as relevant in an email attachment, which will be password protected.
  - b. The password will be sent in a separate email.
  - c. Our email provider is GDPR compliant.
  - d. We advise our clients to ensure that their email provider is also GDPR compliant to minimise the risk of a data breach.
40. We will under no circumstance use open or unsecure Wi-Fi networks to send personal and/or sensitive data electronically.

### Links to other websites

41. This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them.

### Changes of business ownership and control

42. in2gr8mentalhealth Ltd may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of in2gr8mentalhealth Ltd. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us.



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43. We may also disclose Data to a prospective purchaser of our business or any part of it.  
44. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

### Cookies

45. This Website may place and access certain Cookies on your computer. in2gr8mentalhealth Ltd uses Cookies to improve your experience of using the Website and to improve our range of products and services. in2gr8mentalhealth Ltd has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times.
46. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law.
47. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling in2gr8mentalhealth Ltd to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.
48. This Website may place the following Cookies:

Type of Cookie	Purpose
Strictly necessary cookies	These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
Functionality cookies	These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

49. You can find a list of Cookies that we use in the Cookies Schedule.
50. You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.
51. You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings.
52. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.



Valuing and supporting  
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## Privacy Policy

53. For more information generally on cookies, including how to disable them, please refer to [aboutcookies.org](http://aboutcookies.org). You will also find details on how to delete cookies from your computer.

### General

54. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.
55. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected.
56. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.
57. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

### Changes to this privacy policy

58. in2gr8mentalhealth Ltd reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact in2gr8mentalhealth Ltd by email at [contact@in2gr8mentalhealth.com](mailto:contact@in2gr8mentalhealth.com).

### Attribution

59. This privacy policy was created using a document from [Rocket Lawyer](https://www.rocketlawyer.com/gb/en) (<https://www.rocketlawyer.com/gb/en>).

06 June 2020

### Right to complain

60. If you have any feedback about the service you receive from in2gr8mentalhealth Ltd, or you wish to make a complaint, please do not hesitate to contact us directly. We welcome feedback from our clients and will try our best to resolve your complaint and will always take it seriously, as it allows us to improve the services that we offer.
61. This privacy notice was drafted with simplicity and clarity in mind. It does not provide exhaustive detail of all aspects of in2gr8mentalhealth Ltd's collection and use of personal information. However, we are happy to provide any additional information or



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## Privacy Policy

explanation needed. Any requests for this should be sent to our registered address below:

In2gr8mentalhealth Ltd

20-22 Wenlock Road

London

N1 7GU

62. In the first instance we would encourage you to contact one of our directors with any complaints or if you have reason to believe that we have not complied with data protection laws. Alternatively, you have a right to lodge a complaint with the Information Commissioner's Office (ICO).

### Contact us

Dr Natalie Kemp, Clinical Psychologist

Chair and Director at in2gr8mentalhealth Ltd

Email: [NatalieKemp@in2gr8mentalhealth.com](mailto:NatalieKemp@in2gr8mentalhealth.com)

Dr Anna C Sicilia, Clinical Psychologist

Director at in2gr8mentalhealth Ltd

[AnnaSicilia@in2gr8mentalhealth.com](mailto:AnnaSicilia@in2gr8mentalhealth.com)

General queries

[Contact@in2gr8mentalhealth.com](mailto:Contact@in2gr8mentalhealth.com)

### Cookies

Below is a list of the cookies that we use. We have tried to ensure this is complete and up to date, but if you think that we have missed a cookie or there is any discrepancy, please let us know.

Strictly necessary

We use the following strictly necessary cookies:

Description of Cookie	Purpose
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## Privacy Policy

ForceFlashSite	When viewing a mobile site (old mobile under m.domain.com) it will force the server to display the non-mobile version and avoid redirecting to the mobile site
hs	Security
smSession	Identifies logged in site members
XSRF-TOKEN	Security

### Functionality

We use the following functionality cookies:

Description of Cookie	Purpose
svSession	Identifies unique visitors and tracks a visitor's sessions on a site
SSR-caching	Indicates how a site was rendered.
smSession	Identifies logged in site members