

Mental Health Navigator Privacy Policy

Mental Health Navigator C.I.C. PRIVACY POLICY

Mental Health Navigator C.I.C. (also known as the Effective Altruism Mental Health Navigator and the Mental Health Navigator) (the “Organization”) is committed to maintaining robust privacy protections for its users. Our Privacy Policy (“Privacy Policy”) is designed to help you understand how we collect, use, and safeguard the information you provide to us and to assist you in making informed decisions when using our Service.

For purposes of this Agreement, “Site” refers to the Organization’s website, which can be accessed at <https://www.eamentalhealthnavigator.com/> and at <https://www.mentalhealthnavigator.co.uk/>.

“Service” refers to the Organization’s services accessed via the Site, in which users can either request our Advisory Service or make use of the mental health resources and recommendations provided on our website.

The terms “we,” “us,” and “our” refer to the Organization.

“You” refers to you, as a user of our Site or our Service.

By accessing our Site or our Service, you accept our Privacy Policy and Terms of Use (found here: <https://tinyurl.com/5bj46t63>), and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy.

This Privacy Policy will cover the following topics:

- I. Data we collect
- II. How we collect your data
- III. How we use and share your data
- IV. How we store and protect your data
- V. Your data protection rights
- VI. Links to other websites
- VII. Changes to our Privacy Policy
- VIII. How to contact us

I. Data we collect

We collect “Non-Personal Information” and “Personal Information” in order to help you find mental health resources (through our Advisory Service) or to improve your experience on our website.

Non-Personal Information includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information we may collect (including the country in which you access our website), referring/exit pages and URLs, platform types and operating systems, the browser you use to access our website, preferences you submit and preferences that are generated based on the data you submit and number of clicks. We may also fully anonymise data we have previously collected about you via our Advisory Service for research, learning and statistical purposes such that you can no longer be identified.

Personal Information includes your IP address, email, name, date of birth, phone number, and any information you disclose through our online booking or feedback forms, or through consultations sessions with either our director or one of our Advisory Service volunteers.

Your date of birth and phone number are only collected because they are details the Cliniko system uses to match clients booking online to existing clients. We will not use this data to contact you or pass it on for others to use. We will also collect your email address in order to communicate with you concerning your Advisory Service appointments, and to relay information to you concerning mental health resources.

1. Information collected via Technology

To activate the Advisory Service side of the Service you do not need to submit any Personal Information other than your email address, date of birth, and phone number. To use the Advisory Service of the Service thereafter, you may need to submit further Personal Information, which may include information about your state of mental well-being.

However, in an effort to improve the quality of the Site and the Service, we track information provided to us by your browser or by our software application ([Visitor Analytics](#)) when you view or use the Site, such as the website you came from (known as the “referring URL”), the type of browser you use, the device from which you connected to the Site, the time and date of access, and other information that does not personally identify you. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user’s browser from our servers and are stored on the user’s computer hard drive. Sending a cookie to a user’s browser enables us to collect Non-Personal information about that user and keep a record of the user’s preferences when utilizing our services, both on an individual and aggregate basis.

We use cookies on our website to see how you interact with it and enhance your experience. By selecting “accept all”, you agree to our use of cookies. You can opt-out of these cookies

by selecting “Decline all”. More information about cookies is available here: https://en.wikipedia.org/wiki/HTTP_cookie.

For more information on the privacy practices of Visitor Analytics, please visit the Visitor Analytics Terms of Use web page: <https://www.visitor-analytics.io/en/support/legal-data-privacy-certificates/standard-integration/terms-of-use/>

2. How to manage cookies

You can set your browser not to accept cookies, and this website allaboutcookies.org tells you how to remove cookies from your browser.

3. Information you provide us by registering for an account

In addition to the information provided automatically by your browser when you visit the Site, to become a user of the Service you will need to provide information on Cliniko, thereby creating a personal file on Cliniko. When you provide information via Cliniko, you understand that we will collect, store and use your email address, date of birth, and phone number in accordance with this Privacy Policy.

We will use your email to confirm your account and appointments, and provide service information. However, your date of birth and phone number are only collected because they are details the Cliniko system uses to match clients booking online to existing clients. We will not use this data to contact you or pass it on for others to use.

4. Children's Privacy

The Site and the Service are not directed to anyone under the age of 18. The Site does not knowingly collect or solicit information from anyone under the age of 18, or allow anyone under the age of 18 to sign up for the Service. In the event that we learn that we have gathered personal information from anyone under the age of 18, we will delete that information as soon as possible. If you believe we have collected such information, please contact us at info@mentalhealthnavigator.co.uk.

II. How we collect your data

You directly provide the Mental Health Navigator with most of the data we collect. In addition to the visitor data mentioned above, we collect data and process data when you:

- Register for our services online.
- Voluntarily complete a feedback survey or provide feedback via email.
- Consult with and receive advice from our Advisory Service

III. How we use and share your data

Personal Information:

We do not sell, trade, rent or otherwise share for marketing purposes your Personal Information with third parties, nor otherwise share it with any person except as expressly stated in this Privacy Policy.

Vendors who are performing services for the Organization, such as the servers for our email communications who are provided access to user's email addresses for purposes of sending emails from us, may need to process Personal Information on our behalf. Those vendors use your Personal Information only at our direction, under suitable and lawful contractual terms of confidentiality, and in accordance with our Privacy Policy.

In general, the Personal Information you provide to us is used to help us communicate with you. For example, we use Personal Information to contact users in response to questions, to send information on mental health resources, and solicit feedback.

We may share Personal Information with outside parties if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable legal process or enforceable governmental request; to enforce applicable Terms of Service, including investigation of potential violations; address fraud, security or technical concerns; or to protect against harm to the rights, property, or safety of our users or the public as required or permitted by law.

Non-Personal Information:

In general, we use Non-Personal Information to help us improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyze use patterns on the Site. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners, advertisers and other third parties at our discretion.

Changes at Mental Health Navigator C.I.C.:

In the event we merge with or are acquired by another organization, your Personal Information may be transferred as part of a going concern. You acknowledge and consent that such transfers may occur and are permitted by this Privacy Policy, and that any acquirer of our data may continue to process your Personal Information as set forth in this Privacy Policy.

If our information practices change at any time in the future, we will post the policy changes to the Site so that you may opt out of the new information practices. We suggest

that you check the Site periodically if you are concerned about how your information is used.

1. *Who sees your data?*

The Mental Health Navigator shares your data on an anonymous (no-names) basis with:

- Select members of the Mental Health Navigator team, i.e., the Director and the Advisory Service volunteer (or volunteers if you are helped by more than one volunteer) who meets with you for a consultation or answers your queries
- Potential funders (sometimes this is needed for the impact evaluation)
- Publicly through impact reports, e.g., posts on the EA Forum

Such de-identified information is deemed 'pseudonymised' where we (Mental Health Navigator C.I.C.) are still able to identify you from our records or systems by reference to this Personal Information. However, in respect of these named third parties, it is fully anonymised and they will not be able to identify you from anything we provide.

If you explicitly agree (via a Confidentiality Agreement & Consent Form), the Mental Health Navigator will also share your location (city and country) data in public impact evaluations and narratives describing the Mental Health Navigator Advisory Service. With the utmost effort (as reasonably expected), we will ensure that the information is not identifiable.

We process personal data you share through our Advisory Service on the lawful basis of consent (including explicit consent) under UK GDPR. This data is only used to provide you with information on mental health resources, with your consent. The data you provide about your mental health needs, and any information about your beliefs or racial or ethnic community groups during consultations with our Advisory Service volunteers is special category data. We must explicitly obtain your consent to process this data, and so you must choose to either consent or not consent to using our Advisory and to either agree to or reject our Confidentiality Agreement before engaging with our Advisory Service in order for us to be able to process your data and help you. You can withdraw your consent to us processing your data at any time by contacting us at info@mentalhealthnavigator.co.uk.

We process personal data you share through accessing our website and allowing cookies on the lawful basis of legitimate interest under UK GDPR.

IV. How we store and protect your data

The Mental Health Navigator securely stores your data on Cliniko, and any data provided through feedback forms is stored with the relevant form provider (in our case, Google). This data is only accessible to members of the Mental Health Navigator team with the relevant login and password.

Cliniko stores data on its secure servers. It is encrypted in transfer and at rest, though in-house administrators have access to it for support purposes. To read more about how Cliniko securely stores your data, visit this website: <https://www.cliniko.com/security/>

To read more about how the third party sub-processors Cliniko uses to help its software stay efficient and dependable store your data, visit this website: <https://help.cliniko.com/en/articles/1877915-cliniko-subprocessors>

To read more about how Cliniko helps the Mental Health Navigator maintain compliance with the EU's GDPR, visit this webpage: <https://help.cliniko.com/en/articles/1908020-how-cliniko-helps-you-with-gdpr-compliance>

To read more about how Cliniko helps the Mental Health Navigator maintain compliance with the UK's GDPR, visit this webpage: <https://help.cliniko.com/en/articles/4792789-how-cliniko-helps-you-comply-with-uk-gdpr>

To read more about how Cliniko helps the Mental Health Navigator maintain compliance with the Australian Privacy Principles, visit this webpage: <https://help.cliniko.com/en/articles/4274054-how-cliniko-helps-you-comply-with-the-australian-privacy-principles>

To read more about how Cliniko helps the Mental Health Navigator maintain HIPAA compliance, visit this webpage: <https://help.cliniko.com/en/articles/3266884-how-cliniko-helps-you-with-hipaa-compliance>

To read more about how Cliniko helps the Mental Health Navigator maintain compliance with Canada's national (PIPEDA) and provincial (PIPA, PHIPA, HIA, PHIA, and PHIPAA), visit this webpage: <https://help.cliniko.com/en/articles/3952273-how-cliniko-helps-you-with-canadian-national-and-provincial-privacy-laws>

The security of your Personal Data is important to us. To prevent unauthorized access or disclosure, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the data we collect, including two-factor authentication. It is important to remember that no method of transmission over the Internet, or method of electronic storage is 100% secure, and therefore we cannot 100% guarantee the security of the Personal Data we collect. By using our Service, you acknowledge that you understand and agree to assume these risks.

Data Retention

The Mental Health Navigator will keep your personal data provided for the Advisory Service for up to 1 year, absent (exceptionally) an overriding legal need to retain it in connection with, for example, safeguarding or legal claims.

We will keep your personal data provided though accessing our website for up to 5 years. Once this time period has expired, we will erase your data by removing it from all of our

databases and form providers. Please note that anonymised data may be retained and, once shared publicly in anonymised form (e.g. through impact assessments shared on the EA Forum), will not be deleted.

V. Your data protection rights

The Mental Health Navigator would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to be informed - You have the right to be informed about the collection and use of their personal data.

The right of access - You have the right to request that the Mental Health Navigator provides you with copies of your personal data.

The right to rectification - You have the right to request that the Mental Health Navigator corrects any information you believe is inaccurate. You also have the right to request that the Mental Health Navigator completes the information you believe is incomplete.

The right to erasure - You have the right to request that the Mental Health Navigator erases your personal data, under certain conditions.

The right to restrict processing - You have the right to request that the Mental Health Navigator restricts the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to the Mental Health Navigator's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that the Mental Health Navigator transfers the data that we have collected to another organization, or directly to you, under certain conditions.

Please note that these rights are not absolute and may be subject to lawful and/or necessary exemptions in certain circumstances.

If you make a request, we have one month to respond to you (unless we need to extend this by reason of the number or complexity of the request(s)). If you would like to exercise any of these rights, please contact us via email: info@mentalhealthnavigator.co.uk

VI. Links to other websites

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Site and the Service. Therefore, this Privacy Policy

does not apply to your use of a third party website accessed by selecting a link on our Site or via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

VII. Changes to our Privacy Policy

The Organization reserves the right to change this policy and our Terms of Service at any time. We will notify you of significant changes to our Privacy Policy by sending a notice to the primary email address specified in your account or by placing a prominent notice on our site. Significant changes will go into effect 30 days following such notification. Non-material changes or clarifications will take effect immediately. You should periodically check the Site and this privacy page for updates.

The Organization keeps its privacy policy under regular review and places any updates on this web page.

Last Updated: This Privacy Policy was last updated on 14 July 2023.

VIII. How to contact us

If you have any questions about the Mental Health Navigator's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: info@mentalhealthnavigator.co.uk

IX. How to contact the appropriate authority

Should you wish to report a complaint or if you feel that Mental Health Navigator C.I.C. has not addressed your concern in a satisfactory manner, or if you otherwise wish to understand more about your personal data rights, you may contact the Information Commissioner's Office. See the website here to find your relevant office:
<https://ico.org.uk/global/contact-us/>