

## Penumbra Trading Ltd Privacy Policy (last updated 24 May 2018)

Penumbra Trading Ltd is committed to protecting your privacy and takes great care to safeguard any personal information you provide to us. We want you to be confident about how your personal information will be looked after and used.

The purpose of this policy is to let you know how we will process information we collect from you/about you or that you provide to us.

The Privacy Policy explains:

1. About Penumbra Trading Ltd.
2. What information we collect and why?
3. How we will collect, use and keep your information safe.
4. Who we share your information with.
5. Your rights.
6. Changes to the Privacy Policy.
7. How to contact us.

### ***About Penumbra Trading Ltd***

I•ROC wellbeing is an outcomes based approach to personal recovery. Developed by mental health practitioners and people with lived experience, the I•ROC wellbeing approach is now used in a range of in-patient and community settings worldwide by community nurses, clinical psychologists working with people with complex trauma, and many 3rd sector organisations and recovery colleges.

Penumbra Trading Ltd is a company incorporated in Scotland No SC 143298.

### ***What information we collect and why?***

The personal information we collect, and how we use it, will depend on your engagement with us but it may include details about your name, date of birth and contact details (eg telephone, email, computer IP address and home address). We require this information in order to respond to your enquiry; if we are providing you with a service or information; if we are contacting you about our fundraising activities, campaigns or policy initiatives or appeals; or we are entering into a

contract with you. If you are making a donation or signing up to be a regular donor online, your payment card information will be processed by a specialist online payment provider.

We gather general information about the use of our websites – this might include which pages are the most visited. Wherever possible, this information will be anonymised and will not identify details about individuals visiting our website.

### ***How we will collect, use and keep your information safe***

#### **We will collect information in the following ways:**

- Directly from you when you:
  - Enquire about our activities.
  - Visit our website.
  - Receive a service from I.ROC wellbeing
  - Engage with us via social media.
  - Make a complaint.
  - Submit a job application.
- Indirectly:
  - When you have given permission to other organisations to share your information.
  - Via one of our partnerships
  - When we deliver services as part of a contract.
  - Information publicly available.
- Cookies: are very small files that are stored on your computer (phone or tablet) when you visit most websites. We use cookies to collect information about how our visitors use our website and to make it better/easier to use. You can choose not to accept cookies but this could make our website difficult to navigate. There are more details in our Cookie Policy.

#### **How we will use that information**

We may use your information to:

- Provide you with the service, product, advice or information you have asked for.
- Fulfil a contract.
- Understand how we can improve our services, products, information.

- Keep a record of your relationship with us; keep your information up-to-date and accurate and to ensure we comply with your communication preferences.
- Help us to ensure that our communications to you are relevant.
- Undertake analysis and statistical reporting. Where we undertake this activity the data is usually anonymised unless and except we have advised and confirmed this with you in advance.

### **How we will keep your information safe**

We ensure that there are appropriate technical, physical and organisational measures in place to protect your personal information both on-line and off-line.

Information that we hold on you will be stored securely and only be kept as long as is reasonable and necessary, and in-line with any statutory obligations placed on us. The length of time we keep your information will depend on the reason why we have been or are processing your information.

### ***Who we share your information with***

We will never sell your information to another organisation. Penumbra Trading Ltd work with partner and statutory organisations and we may need to share some of your personal information with them, so that they can provide products and services to you. All partner organisations we work with adhere to a privacy policy.

Where there is a perceived threat to life or serious concerns, Penumbra Trading Ltd may be required, in-line with its duty of care, to report these concerns to the police or social work.

Where you have chosen to share your story to help further our work and you have given your explicit consent we may share sensitive information in materials promoting our campaigning, services or fundraising work or in specific documents.

We will comply and co-operate with regulatory authorities when we are legally required to do so – in such cases personal information would be passed on in accordance with the data protection legislation.

## ***Your rights***

You have a right to request a copy of the personal information we hold about you. Please see contact details below if you wish to do this.

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

You can also instruct us to have the information you provided to us sent to another organisation, where we hold this information with your consent and where it's technically feasible.

You have the right to complain to the regulator, the Information Commissioner's Office, if you think we haven't complied with data protection laws.

## ***Changes to the Privacy***

The laws concerning privacy issues continue to change and so we will keep our Privacy Policy under regular review to ensure that it accurately reflects how we process your information.

## ***How to contact us***

If you have any questions about this Privacy Statement or any other Data Protection queries; would like to make a request to receive a copy of your personal information held by Penumbra Trading Ltd; or to change how we contact you, please contact:

- By email: [hello@irocwellbeing.com](mailto:hello@irocwellbeing.com)
- Or write to us at: Penumbra Trading Ltd, Norton Park, 57 Albion Road, Edinburgh, EH7 5QY