

<http://www.cari.org.uk> Privacy policy

Date of last revision: May 2022

www.cari.org.uk is owned and operated by Wellbeing With Cari, which is part of the Maria Paviour Company Ltd (CN: 08649396) whose address is Office 5-7 Sussex Innovation Centre, University of Sussex, BN1 9SB 01273 934136

Maria Paviour Company Ltd is the Data Controller. Our privacy policy relates only to information that you provide to us. Our Data Protection Officer is Maria Paviour, maria@mariapaviour.com

Author: Polly Pomfrey
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Version: 1.2
Signed off by: Maria Paviour

Next review date: May 2023

Date	Version	Revision	Comment	Sign off
04/06/2020	2021_1	Minor amendment to sharing data to make clearer	Updated by Polly Pomfrey	Maria Paviour
26/05/22	1.2	Adjustment to data storage and security/data sharing to include Standard Contractual Clauses rather than Privacy Shield for data processors outside EU/UK Amendment to data storage and security/coaching services to clarify process Amendment to data collected to include "may" collect mobile number	Update: Polly Pomfrey	Maria Paviour

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What will we do with the information you provide?

The information you provide to us when completing a wellbeing consultation at www.cari.org.uk will be processed:

- to administer your user account with us
- to provide you with an immediate personal wellbeing profile and support via email
- to comply with our statutory and regulatory obligations
- to provide anonymous, statistical data for research into mental health and resilience
- if enough people from within your organisation respond (minimum of 10) all responses will be anonymously collated to give an overall picture of the resilience and wellbeing of the organisation as a whole. This will be used to inform support initiatives.

Cari® is online wellbeing at work software. It works by collating the responses you give to the questions, and analysing the data automatically using complex algorithms. The software then presents the results to you as your wellbeing snapshot.

Future use of data

Wellbeing profiles are grouped according to wellbeing level. These are identified as robust, reactive, reduced, and unhealthy. If you are taking part in a Cari consultation as part of an organisation, or you are signed up to the Cari for individuals service, you may be offered focussed support based on your wellbeing level. Cari® will automatically determine your level of wellbeing, and email you to offer you specific support (for example wellbeing coaching). Your data still remains confidential, unless you choose to share it: if you are an employee, your employer will not ever be informed who has been offered what support. We will provide statistical information only regarding uptake of support offer. This may include the number of people who have attended a workshop or coaching clinic. If you are signed up to the Cari for Individuals service, we will send you regular emails inviting you to take part in a new wellbeing consultation.

What type of information do we ask for?

The type of information we may ask you for includes:

- your first name
- your e-mail address (this could be work or email address, whichever you prefer)
- your mobile phone number (this could be work or personal, whichever you prefer)
- your responses to the questions asked during your consultation – the questions are related to how you feel at work, and are grouped under the themes of support, relationships, performance, role, and happiness/health.

We may also ask you questions regarding your gender, ethnicity, religion, age, sexuality. If you are asked these questions, you are free to choose not to disclose this information. This information is only used for anonymous monitoring purposes.

Lawful basis for processing

Under the Article 6 of the General Data Protection Regulation (GDPR), the lawful basis we rely on for processing this information is:

6.(a) Your consent. You are able to remove your consent at any time. You can do this by contacting hello@mariapaviour.com or 01273 934136

Some of your data may be sensitive (for example, relating to your health, and optional statistical questions around your demographic), under Article 9 of the GDPR the lawful basis we rely on for processing this information is:

9(2)(a) – Explicit consent of the data subject, unless reliance on consent is prohibited by EU or Member State law

Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information. You can also login at any time at cari.org.uk to view your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the the right to object to the processing of

your personal information in certain circumstances. If you have taken part and would now like your data to be removed, contact us at hello@mariapaviour.com

- Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at hello@mariapaviour.com or 01273 934136 if you wish to make a request.

Sharing your data – who has access?

Your Organisation

If your organisation is signed up to use the Cari platform internally, then nominated and trained staff members will be able to see who has registered an account on the platform. This is so they can provide limited technical assistance – for example, by resending an email invitation or resetting an account. They will not be able to see any response data whatsoever.

Technical support: trained Wellbeing With Cari staff may have access to your data to provide technical support if requested by you. All technicians adhere to strict codes of conduct and confidentiality with regards to personal and sensitive data

Coaching services: If you are completing Cari as part of a wellbeing initiative organised by your organisation, or if you are taking part as an individual, you may be offered coaching support based on a predetermined level of wellbeing. If this is the case, you will be given a link to choose a coach and contact them directly. Your coach will be given access to your data so they are able to explain and discuss your wellbeing profile with you. Wellbeing coaches who work with us are all qualified and experienced, and undergo a vetting process before contracting with us.

Data storage and security:

- Data is hosted on secure Amazon AWS servers in the UK
- Any support/invitation emails are processed using SendGrid (a company based in the US), with whom we have Standard Contractual Clauses in compliance with the GDPR. In addition SendGrid are Privacy Shield certified, have SOC 2 Type II Certification and are registered with the Cloud Security Alliance. No data is stored by SendGrid, the service is only used to send support email(s). More information on SendGrid privacy and security is [available here](#).
- If you are signed up to the Cari for individuals service, we will send you regular emails inviting you to take part in new wellbeing consultations using ActiveCampaign (a company based in the US) with whom we have Standard Contractual clauses in compliance with GDPR, and in addition they are privacy shield certified. More

information on [ActiveCampaign privacy and security](#)

Confidentiality:

We will keep your personal information confidential except where you have posted it for publication or display and/or to the extent that we are compelled to disclose it by law (for example where fraud or other crime is involved) or to comply with an instruction of a regulatory body of competent jurisdiction. From time to time we may be called upon to demonstrate our maintenance of certain standards as set by appropriate authorities and/or to satisfy our auditors and/or to comply with any requirements of the Health and Care Professional Council (UK) or any other relevant regulatory organisation in order to comply with regulations in relation to statutory requirements and to comply with guidelines for best practice and user safety. This includes demonstrating ethical, legal and safe practice through the process of psychological and coaching supervision.

We do not and will not share personally identifiable information with any other parties.

How long will we hold your data?

Your data will be retained for a period of time agreed in our contract with your organisation. This is usually 12 months. If you are signed up to the Cari for individuals service, your data will be retained for 12 months after your last login. This enables you to view your data at any time you wish by logging in to your account. After 12 months, your name and any other personally identifiable information (email address and phone number if provided) will be detached from your responses to the questions, and deleted. Your responses to Cari will be anonymously retained for research purposes

Cookies

Our Website www.cari.org.uk uses “cookies”, which are small text files that we store on your computer to improve the functionality of our Website. We use temporary “session” cookies to pass information between pages on our Website and they are deleted when you close your browser.

The cookies can only be used by our Website and cannot be used to gain other access to information on your computer. You may choose to accept or decline cookies. While most web browsers automatically accept cookies, you may choose to modify your browser settings to decline cookies (see the Help file on your particular browser for details on how to change cookie settings). However, if we cannot use cookies certain functionality of this website will be affected

Amendments to this privacy notice

The Company has the right to amend the above from time to time. Changes will be notified to Account Holders via the email address provided on registration, in advance of the changes taking effect, and via an announcement on the Website. Any update will take effect

on all Account Holders once published on the Website.

Complaints

If you have a complaint regarding any breach of this privacy policy, contact us at hello@mariapaviour.com. When we receive the complaint, we will review it and ensure that we are in compliance with our privacy policy and all applicable laws. We will contact you within 40 days of receiving your complaint to inform you of the results of your complaint.