

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

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[www.cari.org.uk](http://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](mailto:maria@mariapaviour.com)

## What this privacy policy covers

- What will we do with the information you provide?
- What type of information do we ask for?
- Lawful basis for processing
- Sharing your data – who has access?
- How long will we hold your data?
- Your right to access your data
- Your right to object
- Cookies
- Amendments to this privacy notice
- Complaints

## 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](http://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 ask you for includes:

- your first name
- your e-mail address (this could be work or email address, 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](mailto: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](http://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](mailto: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](mailto:hello@mariapaviour.com) or 01273 934136 if you wish to make a request.

## Sharing your data – who has access?

**Technical support:** trained 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 emailed with a link to choose your coach and book your session. Your coach will be given access to your data so they are able to explain and discuss your wellbeing profile during the session.

### Data storage and security:

- Data is hosted on secure IBM servers in Ireland [IBM privacy and security](#)
- Any support emails are sent using SendGrid, who are [Privacy Shield certified](#). 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 who 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](http://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](mailto: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.