**“Privacy Procedure”**

**1. Introduction**

Black Belt Advocacy is committed to data security and the fair and transparent processing of personal data. This privacy policy (Policy) sets out how we will treat the personal data which you provide to us in compliance with applicable data protection law, in particular the General Data Protection Regulation (EU) 2016/679 (GDPR).

Please read this Policy carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data, how to contact us and supervisory authorities in the event that you would like to report a concern about the way in which we process your data.

**2. Who are we?**

Black Belt Advocacy is the trading name of Kate Mercer Training (a limited company). Our primary activity is the delivery of work based qualifications in independent advocacy. We also offer training, elearning, conferences and other support to the independent advocacy sector.

We also provide carers advocacy to any carer who has a loved one within a Cygnet mental health hospital. For the purposes of the GDPR, Kate Mercer Training is the ‘controller’ of the personal data you provide to us.

**3. What type of information do we collect?**

The main type of information we collect, store and process is the information that carers provide to us or information we access as part of the advocacy process. This is likely to include the following information:

* Personal details such as the carers name, telephone number, address.
* The details of the carer’s loved one (name, hospital)
* Summary of the advocacy provided (goals, outcomes, action plans)
* Overview of meetings attended (we will make notes of meetings we attend to assure accountability and transparency)

Through our advocacy work we may be sent confidential and sensitive information (such as ward round reports, Tribunal reports, care plans). Our policy is to use these documents to support the carer during that process but we will NOT keep copies stored of any confidential reports.

We also receive, collect and store any information you enter on our website or provide us in any other way (for example through our ‘contact us’ page or if you purchase other services).

**4. How do we collect information?**

Referral into the carer service is by the carer themselves or by a professional.

Self referral

Most of the carers we work with, will self refer. This could be through the website, freephone number or email. At the point of self referral we will ask the carer for their personal information such as name, phone number and details of what is happening. This information is the minimum required to allow us to understand how best an advocate can help.

Referral from professional

We welcome referrals’ from professionals and may receive the carers personal information such as their name, a phone number or their email address. We will check the carer has consented to this information being shared.

**5. Why do we collect such personal information?**

We collect non-personal and personal information for the following purposes:

1. To provide and operate the carer advocacy service,

2. To provide our users with ongoing customer assistance,

3. To allow the supervision and training of our advocates

4. To be able to contact our users with general or personalised service-related notices and promotional messages,

4. To create aggregated statistical data and other aggregated and/or inferred non-personal Information, which we or our business partners may use to provide and improve our respective services;

5. To comply with any applicable laws and regulations.

**6. Information we collect about you**

If you visit our Website, we may automatically collect the following information:

• technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

• information about your visit to our Website such as the products and/or services you searched for and view, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

Our company is hosted on the Wix.com platform. Any data submitted via the website may be stored through Wix.com’s data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

**7. Sensitive personal data**

In certain limited cases, we may collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, religious beliefs, physical or mental health or sexuality).

However, we will only do so on the basis of your explicit consent and this is only ever used in line with the clearly identified aims such as for monitoring purposes.

**8. How do we use your personal data?**

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

Contract performance: we may use your personal data to fulfil a contract, or take steps linked to a contract:

• to provide the products and/or services to you;

• to communicate with you in relation to the provision of the contracted products and services;

• provide you with industry information, surveys, information about our awards and events, offers and promotions, related to the products and/or services.

Legitimate interests: where this is necessary for purposes which are in our, or third parties, legitimate interests. These interests are:

• providing you with newsletters, surveys, information about our products, events, offers, and promotions, related to products and services offered by us which may be of interest to you;

• communicating with you in relation to any issues, complaints, or disputes;

• improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our Website;

• performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns.

NOTE: you have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading Your rights.

Where required by law: we may also process your personal data if required by law, including responding to requests by government or law enforcement authorities, or for the prevention of crime or fraud.

**8. Who do we share your personal data with?**

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

• legal and other professional advisers, consultants, and professional experts;

• analytics and search engine providers that assist us in the improvement and optimisation of our Website.

We would only share data that identifies you with your consent.

We will share personal data with law enforcement or other authorities if required by applicable law.

**9. How long will we keep your personal data?**

We will retain your personal data for a period of three years following the closure of the advocacy support. This ensures we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities.

Where you receive marketing communications from us, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

**10. Where do we store your personal data and how is it protected?**

We store your personal data in electronic format using cloud based services (including Google, Moodle, Wix and ADI databased). We take reasonable steps to protect your personal data from loss or destruction including password protection to access data. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our Website; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

**11. Your rights**

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond within 30 days of request. Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information. Or if your request is manifestly unfounded or excessive.

Right to rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.

Right to erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed. If you would like to request that your personal data is erased, please contact us using the contact details provided below.

Right to object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes. If you would like to object to the pressing of your personal data, please contact us using the contact details provided below.

Right to restrict processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted. Please contact us using the contact details provided below.

Right to data portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means. If you would like to request that your personal data is ported to you, please contact us using the contact details provided below.

Please note that the GDPR sets out exceptions to these rights. If we are unable to comply with your request due to an exception we will explain this to you in our response.

Right to complain to a supervisory body

You have the right to lodge a complaint with a supervisory authority which is the Information Commissioners Office (the ICO). If you are considering this, we would encourage you to access our complaints policy first to give us the opportunity to correct things and put anything right. If you remain dissatisfied with our reply then you should consider raising your concerns with the ICO.

To lodge a complaint with how we have handled your data, please contact kate.mercer@katemercer-training.com

**13. Contact**

If you have any queries about this Policy, the way in which Kate Mercer Training processes personal data, or about exercising any of your rights, please send an email to [kate.mercer@katemercer-training.com](mailto:kate.mercer@katemercer-training.com)

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