



Privacy Statement March 2024

Catalyst Support Limited is the owner of the website (catalystsupport.org.uk), which is provided and supported by Qlic IT. Catalyst Support Limited (hereafter **Catalyst, us, we, our**) are the controller of personal data obtained via our website, meaning we are the organisation legally responsible for deciding how and for what purposes it is used.

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share any information relating to you (your **personal data**) in connection with your use of our website. It also explains your rights in relation to your personal data and how to contact us or a relevant regulator in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (**UK GDPR**).

Given the nature of our website, we do not expect to collect the personal data of anyone under 16 years old. If you are aware that any personal data of anyone under 16 years old has been shared with our website, please let us know so that we can delete that data.

We are a registered company (No. 3689561) and a registered charity (No. 1075892). We are also registered with the Information Commissioner's Office (ZA182922).

This privacy policy is divided into the following sections:

- [What this policy applies to](#)
- [Personal data we collect about you](#)
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- [How and why, we use your personal data](#)
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What this policy applies to

This privacy policy relates to your information and services may be available. We are not responsible for those third-party websites, and those third parties may also gather information about use of our website only.

Throughout our website we may link to other websites where additional you in accordance with their own separate privacy policies. For privacy information relating to those third-party websites, please consult their privacy policies as appropriate.



Personal data we collect about you.

The personal data we collect about you depends on the particular activities carried out by you through our website, and if you complete our contact or referral forms on the website, you will be asked to provide personal information, such as your name and contact details. Additionally, we might request sensitive categories of data, like health information or racial/ethnic background, to better tailor our services to your needs.

We may also collect and use the following personal data about you:

- your name, address, and contact information, including email address and telephone number.
- details of any information, feedback, or other matters you give to us by phone, email, post or via social media.
- information about the services we provide to you.

Sometimes you can choose if you want to give us your personal data and let us use it. Where that is the case, we will tell you and give you the choice before you give the personal data to us. We will also tell you whether declining to share that personal data will have any effect on your use of our website or any services on it.

We collect and use this personal data for the purposes described in the section '**How and why we use your personal data**' below.

How your personal data is collected.

We collect personal data from you:

- directly, when you enter or send us information, such as when you register with us, contact us (including via email), enrol on services via our website.
- indirectly, such as your browsing activity while on our website; we will usually collect information indirectly using the technologies explained in the section on '[Cookies](#)' below.
- We do not collect personal data about you indirectly, but we may process personal data from other referral sources as part of the care services being provided

How and why, we use your personal data.

Under data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract, or
- for our legitimate interests or those of a third party

A legitimate interest is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own. You can obtain details of this assessment by contacting us (see '**How to contact us**' below).

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	For our legitimate interests as a charity providing support and care to you
Conducting checks to identify you and verify your identity or to help prevent and detect fraud against you or us	For our legitimate interests to keep your personal data secure and to minimise fraud that could be damaging for you and/or us
Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other important notices	Depending on the circumstances: —to comply with our legal and regulatory obligations —in other cases, for our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you
Protecting the security of systems and data used to provide the services	To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Statistical analysis to help us understand our user base	For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you
Updating and enhancing the records of our users	Depending on the circumstances: —we may update your information in our records to fulfil our agreement with you or take necessary steps if you ask before entering a contract. This includes commitments we have made with our partners.

What we use your personal data for	Our reasons
	<p>—to comply with our legal and regulatory obligations</p> <p>—where neither of the above apply, for our legitimate interests, e.g. making sure that we can keep in touch with you about the services we can provide</p>
<p>Making users aware of the full range of support services that are offered and which in our opinion could be beneficial for you</p>	<p>For our and your legitimate interests, i.e. to provide care and support to you</p>
<p>To share your personal data with third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	<p>Depending on the circumstances:</p> <p>—to comply with our legal and regulatory obligations</p> <p>—in other cases, for our legitimate interests, i.e. to protect, realise or grow our business and the care services we provide</p>

How and why, we use your personal data— Special category personal data.

We may collect special category personal data through our website if you submit certain types of referral forms. Certain personal data we collect during the provision of care and support services to you, such as data concerning health, sex life or sexual orientation, is treated as a special category to which additional protections apply under data protection law.

If we collect special category personal data, we will do so only for the purpose of providing the appropriate care and support services.

Where we process such special category personal data, we will also ensure we are permitted to do so under data protection laws.



How and why, we use your personal data—sharing.

See '**Who we share your personal data with**' for further information on the steps we will take to protect your personal data where we need to share it with others.

Marketing

We will use your personal data to send you updates (by email, text message, telephone, or post) about our services and the care and support we provide.

We have a legitimate interest in using your personal data for these purposes (see above '**How and why we use your personal data**'). This means we do not need your consent to send you such information. If we change our approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

contacting us at communications@catalystsupport.org.uk

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

For more information on your right to object at any time to your personal data being used for marketing purposes, see '**Your rights**' below.

Who we share your personal data with

For permitted purposes, we may share personal data with:

- third parties we use to help deliver our services to you.
- other third parties we use to help us run the services we provide, e.g. contractors and agents, website hosts and website analytics providers.

on the basis that they keep your personal data confidential and secure in accordance with the law and only for the lawful purpose for which it has been shared with them.

We only allow those organisations to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data.

We or the third parties mentioned above occasionally also share personal data with:



- Our and their external auditors, e.g. Regarding the audit of care services, the recipient must adhere to confidentiality rules set by Our Trustees, aligning with guidelines from the Charity Commission.
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations.
- law enforcement agencies, courts, tribunals, and regulatory bodies to comply with our legal and regulatory obligations.
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised, but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Who we share your personal data with—further information.

If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

How long your personal data will be kept

We will not keep your personal data for longer than we need it for the purpose for which it is used. For example, after the conclusion of care and support services have been provided, we will retain the notes on your file for 7 years.

However, different retention periods may apply for different types of personal data. You may contact us (see "**How to contact us**" below) if you would like details on the retention of a particular type of personal data.

Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

Transferring your personal data out of the UK

The UK and other countries outside the UK have differing data protection laws, some of which may provide lower levels of protection of privacy.

It is sometimes necessary for us to transfer your personal data to countries outside the UK. In those cases, we will comply with applicable UK laws designed to ensure the privacy of your Data.

Under data protection laws, we can only transfer your personal data to a country outside the UK where:

- the UK government has decided the particular country ensures an adequate level of protection of personal data (known as an '**adequacy regulation**') further to Article 45 of the UK GDPR.



- there are appropriate safeguards in place, together with enforceable rights and effective legal remedies for you, or
- a specific exception applies under relevant data protection law.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) legally approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on ‘**Changes to this privacy policy**’ below.

Cookies

A cookie is a tiny text file placed on your device, like a computer or smartphone, when you use our website. We use cookies to recognize you and your device, storing some info about your preferences or past actions. If you would like more details on cookies, how we use them, when we seek your consent, and how to disable them, check out our [Cookie Policy](#).

Your rights

You generally have the following rights, which you can usually exercise free of charge:

Access to a copy of your personal data	The right to be provided with a copy of your personal data
Correction (also known as rectification)	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of use	The right to require us to restrict use of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used, and machine-readable format and/or transmit that data to a third party—in certain situations

To object to use	<p>The right to object:</p> <p>—at any time to your personal data being used for direct marketing (including profiling)</p> <p>—in certain other situations to our continued use of your personal data, e.g. where we use your personal data for our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise, or defence of legal claims</p>
Not to be subject to decisions without human involvement	<p>The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.</p> <p>We do not make any such decisions based on data collected by our website</p>
The right to withdraw consents	<p>If you have provided us with a consent to use your personal data, you have a right to withdraw that consent easily at any time.</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

For further information on each of those rights, including the circumstances in which they do and do not apply, or to exercise any of those rights, please contact us (see ‘**How to contact us**’ below). You may also find it helpful to refer to the [guidance from the UK’s Information Commissioner](#) on your rights under the UK GDPR.

If you would like to exercise any of those rights, please email, call, or write to us—see below: ‘**How to contact us**. When contacting us please:

- provide enough information to identify yourself (e.g. your full name, email address) and any additional identity information we may reasonably request from you, and
- let us know which right(s) you want to exercise and the information to which your request relates.



Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, used, or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it. We continually test our systems and our IT managed service provider follow top industry standards for information security including Cyber Essentials, ISO 27001, and ISO 9001.

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.

If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

Please contact us if you have any queries or concerns about our use of your personal data (see below '**How to contact us**'). We hope we will be able to resolve any issues you may have.

You also have the right to lodge a complaint with the Information Commissioner. The Information Commissioner may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

Changes to this privacy policy

We may change this privacy policy from time to time—when we make significant changes, we will take steps to inform you, for example *by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.*



How to contact us

You can contact us by post, email, or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Our contact details	Our Data Protection Lead
14 Jenner Road Guildford, GU1 3PL Info@catalystsupport.org.uk 01483 590150	Paul Widdows dataprotection@catalystsupport.org.uk 01483 590150



REGISTERED OFFICE: 14 JENNER ROAD, GUILDFORD, SURREY, GU1 3PL
T: 01483 590150 E: INFO@CATALYSTSUPPORT.ORG.UK WWW.CATALYSTSUPPORT.ORG.UK

REGISTERED CHARITY NO. 1075892 COMPANY NO. 3689561

