

## FRONTLINE19 MEMBER PRIVACY STATEMENT

**FRONTLINE THERAPISTS LIMITED**, a business operating the website at [www.frontline19.com](http://www.frontline19.com) (the 'Site') is a company incorporated under the laws of England and Wales with registered number 12549595 whose registered office is at 63-66 Hatton Gardens, Fifth Floor, Suite 23, London EC1N 8LE ('Frontline19', 'Us', 'Our' or 'We') and has created this privacy statement ('Statement') in order to reflect the transparency requirements expected of Us by law and Our own ethics. In this Statement, references to 'You', 'Your', 'Volunteer', 'Supported Person' or 'Frontline Therapist' or 'Frontline19 Member' are references to the person who uses the Site to avail of the Frontline19 Services.

Your privacy is extremely important, and We are only too happy to comply with the law and provide You with clear and transparent information about how We use Your Personal Data ('PD'). We only process it for the purposes outlined and We process as little of it as possible. Our aim is not to be intrusive and We undertake not to ask You irrelevant or unnecessary questions. We will try Our best to keep Your PD accurate and up-to-date but do try to help Us with this too please!

We also have robust measures and procedures in place to minimise the risk of unauthorised access and to keep it secure. Also, We only share it with third parties where We have a right to do so and where we are satisfied that the third party shall treat it with the same or higher levels of respect.

This document outlines how We process Your PD when You use the Site or otherwise communicate with us including by email or telephone. We are committed to respecting Your privacy and protecting Your PD. For the purpose of the Data Protection Legislation, We are the Data Controller (ICO registration number: A1100265).

For all matters relating to privacy and data protection, please contact Our Data Protection Manager (DPM) by email to [contact@frontline19.com](mailto:contact@frontline19.com).

This Statement incorporates Our [Cookie Policy](#), Our [Website Terms of Use](#) (and Volunteer Terms and/ or Supported Person Terms as applicable) by this reference.

We might make changes to this Statement but if We do, We will, where appropriate, notify You by email, or, when You next log in, the amended version (and specific terms) will be displayed on-screen and You may be required to read and accept them to continue.

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### 1. HOW DO WE PROCESS YOUR PERSONAL DATA?

**1.1 PERSONAL DATA YOU PROVIDE TO US VOLUNTARILY:** In order for Us to provide You with Our Services, We need to process some of Your PD. We understand that Your PD belongs to You and You provide it to Us on trust that We will use it lawfully i.e. appropriately, proportionately, only in respect of the stated purpose and We will only hold on to it for as short a time as possible. Most important of all, We must have a valid *lawful basis* for processing Your PD (and where We are processing Special Category Data, We also need to identify an *additional exception* for processing this type of data). Rather than have lots of paragraphs of text where all these transparency requirements are scattered throughout this Statement, We hope You find having most of it all in one eyeshot in Our tables easier to navigate:

Personal Data ('PD')	Source	Purpose	Lawful Basis for general processing	Retention
<p><b>Frontline Therapist:</b></p> <p>Information that You give Us including:</p> <ul style="list-style-type: none"> <li>- Your full name, email, phone number, qualification (Course title, award, year completed), number of years in Your field, (Supervisor's name and number)</li> </ul>	Volunteer	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>- Provide, manage and administer the Frontline19 Services.</li> <li>- Help Us to ensure that Our Frontline19 Members are genuine.</li> <li>- Ask for information and feedback from You.</li> </ul>	For Processing this PD, We rely on the fact that You have a <b>Contract</b> with Us.	6 years from the last time You use Our Frontline19 Services.
<p><b>Supported Person:</b></p> <p>Information that You give Us concerning Your health and well-being (Special Category Data).</p>	Supported Person	We use this information to provide, manage and administer the Frontline19 Services by matching a Supported Person up with the a more suitable Volunteer.	For Processing this PD, We rely on the fact that You have a <b>Contract</b> with Us ( <a href="#">Article 6(b)</a> ) and we also rely on the exemption available for the provision of social care ( <a href="#">Article 9(h)</a> ).	6 years from the last time You use Our Frontline19 Services.
<p><b>Supported Person:</b></p> <p>Information that You give Us including:</p> <ul style="list-style-type: none"> <li>- Your first and last name, email address, mobile number, COVID-19 role, NHS badge number or ID.</li> </ul>	Supported Person	(as above)	For Processing this PD, We rely on the fact that You have a <b>Contract</b> with Us.	6 years from the last time You use Our Frontline19 Services.
Technical information about the way You use Our Services including whether You have opened Electronic Mail from Us (and clicked on links in them).	Frontline19 Member	We use this information, including to monitor the effectiveness of the Site and Our Non-Marketing Communications.	For Processing this PD, We rely on Our <b>legitimate interests</b> of Our business.	6 years from the last time You use Our Frontline19 Services.
<p>Information when You communicate with Us whether in person, via the Site or via email, over the phone, through social media or via any other medium, including:</p> <ul style="list-style-type: none"> <li>- Your contact details (this may include Your social media account if that's the way You communicate with Us).</li> <li>- The details of Your communications with Us (including when You sent it, when We received it and where You sent it from (such as Our Site, via email, through social media)).</li> <li>- The details of Our messages to You.</li> </ul>	Frontline19 Member	<p>We use this information, including to:</p> <ul style="list-style-type: none"> <li>- Answer any issues or concerns.</li> <li>- Monitor Frontline19 Member communications for quality and training purposes.</li> <li>- Develop new Frontline19 Services (or improve existing ones) which are based on the information and feedback You provide (and the information and feedback provided by others which is similar to Your information and feedback).</li> </ul>	For Processing this PD, We rely on the fact that You have a <b>Contract</b> with Us.	6 years from the last time You use Our Frontline19 Services.

- 1.2 We do want to be of value to You during Our relationship so if We ever require further PD from You or if We would like to use Your PD for a different purpose, then We will always provide You with additional information about this at the point that You are invited to make use of these additional services.
- 1.3 **OUR RETENTION RIGHTS:** How long We keep Your PD depends on the context in which You provide it and the purpose for which We use it. See the last column in the table above. Do note that We need to retain sufficient information about You in compliance with certain legal or statutory requirements, for example, in the event of a legal or insurance claim in the future so that We can identify You.
- 1.4 **TECHNICAL DATA WE MAY PROCESS WHEN YOU USE OUR SERVICES:** This typically relates to Technical Data involving the use of cookies and other technologies. This data is typically processed via the use of first party cookies or third party cookies (e.g. where We use third party services by way of plugins or other software licensed to Us by a third party e.g. analytics related to the use of Our own Site OR cookies set by operators of a third party service such as social media and file sharing networks e.g. Twitter and FaceBook). The types of data obtained about You may include Your e.g. visits to the Site; page views, downloads, navigation and exit; IP address; geographical location; browser type and version; operating system; referral source; length of Your visit (**‘Technical Data’**). This enables Your online activity to be tracked and for advertisements to be targeted to You (subject to Your cookie consent management preference settings). **Where We state that We rely on consent to process Your PD for a particular purpose, You have the right to withdraw Your consent at any time. This will not affect the lawfulness of processing carried out by Us which was based on consent before its withdrawal.** To learn more, please see Our [Cookie Policy](#).

**2. HOW DO WE USE YOUR PERSONAL DATA TO COMMUNICATE WITH YOU?**

- 2.1 **NON-MARKETING COMMUNICATIONS:** You acknowledge that, Your PD may be used by Us (or a Service Provider on Our behalf) to contact You when necessary in connection with Your use of the Site and to access Our Services as follows:

Non-Marketing Communication?	Method of receipt	Lawful Basis for general processing
As part of Your volunteering commitment (as a Volunteer), or receipt of the free therapeutic services from a Volunteer (as a Supported Person), You may receive communications from Us regarding this. By registering with Us, you agree to receive these communications which are considered to be administrative only.	telephone, email, SMS	For Processing this PD, We rely on the fact that You have a Contract with Us.

- 2.2 **LEGITIMATE INTERESTS TO PROCESS YOUR PERSONAL DATA:** We may process PD about You where We rely on “legitimate interests” as Our lawful basis. Where this is the case, We will have carried out an assessment to determine that We have valid and lawful rights to do so. Despite this, if it bothers You, You have the right to object to any of the processing We undertake by completing Our [Data Subject Rights Request Form](#).
- 2.3 **RESEARCH & STATISTICS:** We may use communications information to compile anonymous statistical reports showing information like the number and type of query and how each has been resolved. Occasionally We will use information provided to develop case studies for learning and development purposes. We will be very careful to ensure that any information that could re-identify a person is removed or changed to preserve anonymity.
- 2.4 **OTHER WEBSITES OR APPLICATIONS & THEIR POLICIES:** The Site may contain links to other websites or applications. We are not responsible for the privacy practices or policies or for the content of such websites or applications of such third parties, so You should be careful to read and understand those policies independently.

**3. WHO HAS ACCESS TO YOUR DATA & WHERE IS IT STORED?**

**3.1 THIRD PARTIES:**

We may engage or collaborate with a Third Party for a variety of different reasons. This may be in relation to the performance of Our business and daily operational functions on Our behalf to enable Us to fulfil Our Services only (including making improvements to Our Services). Where it is necessary to share Your PD, We will limit the PD that We share to the minimum required to provide the Service and the Data Processor (or Data Controller) will only be able to use it for the specific purposes for which it was shared. If We stop using the service of a Data Processor, We ensure Your PD is deleted or securely returned to Us.

From time to time, We may transfer Your PD to a related company, agent or contractor (also known as an independent Data Controller) e.g. where We introduce You to a complimentary service.

From time to time, We may transfer Your PD to a related company, agent or contractor (also known as a Joint Data Controller) e.g. where We collaborate on a joint project together.

The last column relates to where the PD goes and what safeguards are in place in the recipient territory where it is transferred/ stored. It will be one or more of the following:

WHERE?	INFO AROUND SAFEGAURDS
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United Kingdom	We may store some or all of the PD in the United Kingdom only. Should We need to transfer Your PD outside of the UK or EEA in the future, it will be in compliance with the GDPR requirements for external transfer and all details will be added to Our Statement.
Within the EEA	We may store some or all of the PD in the EEA. Should We need to transfer Your PD outside of the EEA in the future, it will be in compliance with the GDPR requirements for external transfer and all details will be added to Our Statement.
Outside EEA	We may store some or all of the PD in a country outside of the UK and EEA. We will not transfer Your PD to any Third Parties based in other countries outside the EEA unless there is a <b>European Commission adequacy decision</b> , the <b>EU-US Privacy Shield Certification</b> or the EU Commission approved <b>Standard Contractual Clauses</b> are in place.

If You would like more information about any of the transfer safeguards We implement please contact Us using the details as set out at Clause 5 of this Statement.

What type of PD is shared with Third Parties by Us?	What is Our role? DC or DP	What is the Third Party's specific name? OR category of Third Parties?	Third Party Role: JDC or IDC or DP	What is the Purpose of sharing the PD?	What Lawful Basis do We rely on to transfer the PD?	Where is the PD transferred to? What safeguards are in place?
All PD related to the purpose i.e. all registration data of a Frontline19 Member.	DC	<a href="https://digitalbeans.agency/">https://digitalbeans.agency/</a>	DP	To build, maintain and host the Site.	Contract	All of the PD is stored in a datacentre in London only.
Email and/ or telephone number of Frontline19 Member	DC	<a href="https://www.twilio.com/legal/tos">https://www.twilio.com/legal/tos</a>	DP	Email (& SMS) Services - Email (and phone number) is passed through to Send Grid for email (& SMS) sending purposes.	Contract	This third party participates in and has certified its compliance with the <b>EU-US Privacy Shield Certification</b> <a href="https://www.twilio.com/legal/privacy">https://www.twilio.com/legal/privacy</a>
Supported Person's PD i.e. the information set collected in the sign-up registration form.	DC	Frontline Therapist	DC	To enable the Frontline Therapist to provide the therapeutic services to the Supported Person with whom they are matched.	Contract	In accordance with the individual Frontline Therapist's privacy statement.
All PD related to the purpose	DC	Legal Advisors & Legal Authorities/ Enforcement bodies	DC	to enforce the terms under which You transact or communicate with Us/ to assist law enforcement	Legal/ Statutory obligation & Contract	Unknown but are (or will be UK based)
All PD related to the purpose	DC	Microsoft Inc <a href="https://www.microsoft.com/en-gb/">https://www.microsoft.com/en-gb/</a>	DP	To use Outlook email/ store documents on OneDrive	Contract	This third party participates in and has certified its compliance with the <b>EU-US Privacy Shield Certification</b>
All PD related to the purpose	DC	Google LLC <a href="https://drive.google.com/drive/">https://drive.google.com/drive/</a>	DP	To store documents in GoogleDrive	Contract	This third party participates in and has

						certified its compliance with the <b>EU-US Privacy Shield Certification</b> <a href="https://policies.google.com/privacy/frameworks?hl=en&amp;gl=US">https://policies.google.com/privacy/frameworks?hl=en&amp;gl=US</a>
Name and email	DC	Rocket Science Group LLC <a href="https://mailchimp.com/">https://mailchimp.com/</a>	DP	Direct electronic mailings & consent management including creation of suppression lists to ensure a Frontline19 Member who objects to processing is excluded in the future. This is in relation to Volunteers only and Non-Marketing Communications only.	Contract	This third party participates in and has certified its compliance with the <b>EU-US Privacy Shield Certification</b> <a href="https://mailchimp.com/legal/privacy/#3_Privacy_for_Contacts">https://mailchimp.com/legal/privacy/#3_Privacy_for_Contacts</a>
Name, contact details and any other PD that is placed on Facebook by You and made accessible to Us	DC	<a href="https://www.facebook.com/">https://www.facebook.com/</a>	JDC	So that the Data Subject can be a part of the Facebook Page community. More information can be found on Facebook <a href="#">here</a> .	Consent (Article 6(1))  Where You share Your own Special Category Data, We rely on the additional exception that the PD is manifestly made public (We are defining 'public' as in the Facebook Audience and this is in accordance with	This third party participates in and has certified its compliance with the <b>EU-US Privacy Shield Certification</b> <a href="https://www.facebook.com/about/privacyshield">https://www.facebook.com/about/privacyshield</a>

					Facebook's Ts & Cs) (Article 9(2)(e) GDPR)	
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**3.2 Transfer of Personal Data in the Event of the Sale of Frontline Therapists Limited or its Assets**

In the event that Frontline Therapists Limited is sold or transfers some of its assets to another party, Your PD could be one of the transferred assets. If Your PD is transferred, its use will remain subject to this Statement. Your PD will be passed on to a successor in the event of a liquidation or administration.

**4. WHAT ARE YOUR RIGHTS UNDER DATA PROTECTION LEGISLATION?**

**4.1** You have a number of rights that You can exercise free of charge and on request in certain circumstances, however, if Your requests are obviously unfounded or excessive, We reserve the right to charge a reasonable fee or to refuse to act. You have the right:

- to be informed about the collection and use of Your PD. This is what this Statement fulfils;
- to access Your PD and supplementary information ('DSAR');
- to have inaccurate PD corrected, or completed (if it is incomplete);
- to have Your PD erased;
- to restrict Our processing of Your PD;
- to receive a copy of any PD You have provided to Us, in a machine-readable format, or have this information ported to a third party;
- to object AT ANY TIME to processing of Your PD for direct marketing purposes;
- to object in certain other situations to the continued processing of Your PD.

For more information on these rights and when you can exercise them, see the [Information Commissioner's Guide](#)

**4.2** If You wish to exercise any of these rights, please complete Our [Data Subject Rights Request Form](#). We will respond to You within one month from when We receive Your request, unless the complexity and number of requests We receive means that we need more time. If We do need more time (up to two further months), We will tell You why within the first month.

**5. HOW CAN YOU SUBMIT A QUERY OR A COMPLAINT?**

**QUERY:** We are happy to provide any additional information or explanation needed in respect of Our processing activities upon request. For all matters relating to privacy and data protection, please contact Our DPM.

**COMPLAINT:** We try to meet the highest standards when processing Your PD. For this reason, We take any complaints We receive about this very seriously and We encourage You to bring it to Our attention. While We hope to be able to resolve any concerns You have about the way that We are processing Your PD, You have the right to lodge a complaint with the Information Commissioner's Office (ICO) (or with the supervisory authority of the European Member State where You work, normally live or where the alleged infringement of data protection laws occurred) if You believe that Your PD has been processed in a way that does not comply with the Data Protection Legislation or have any wider concerns about Our compliance. You can do so by calling the ICO helpline on 0303 123 1113 or via their website [here](#).

**6. DO WE USE COOKIES?**

For information about cookies and how they are used on the Site, please visit Our [Cookie Consent Preference Management Centre](#) accompanied by Our [Cookie Policy](#).

**7. CHANGES TO THIS STATEMENT**

We keep Our Statement under regular review. This Statement was last updated on 01<sup>st</sup> March 2020.

**8. DEFINITIONS & INTERPRETATIONS**

**Data Controller or DC or JDC or IDC:** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of PD (**Article 4(7)**);

**Data Processor or DP:** means a natural or legal person, public authority, agency or other body which Processes PD on behalf of the Data Controller (**Article 4(8)**);

**Data Protection Legislation:** means, as applicable to either Party:

- (a) the [General Data Protection Regulation 27 April 2016](#);
- (b) the [Data Protection Act 2018](#);
- (c) the [Privacy and Electronic Communications \(EC Directive\) Regulations 2003](#);

- (d) any other applicable law relating to the processing, privacy and/or use of PD, as applicable;
- (e) any laws which implement any such laws; and,
- (f) any laws that replace, extend, re-enact, consolidate or amend any of the foregoing.

**Data Protection Manager (DPM):** [privacy@frontline19.com](mailto:privacy@frontline19.com).

**DSAR:** refers to right of access to data by a data subject as further described in Clause 4.

**EEA:** refers to the European Economic Area which consists of all EU member states, plus Norway, Iceland, Liechtenstein.

**Electronic Mail:** includes but is not limited to email, text, video, voicemail, picture and answerphone messages (including push notifications).

**Frontline19 Member:** refers to a 'Volunteer' and/ or a 'Supported Person' who uses the Site to avail of the Frontline19 Services.

**Frontline19 Services:** refers to the services provided by Frontline19.

**General Data Protection Regulation or GDPR:** the General Data Protection Regulation ((EU) 2016/679). PD is subject to the legal safeguards specified in the Data Protection Legislation including the GDPR.

**Non-Marketing Communication(s):** refers to any communication which is functional/ administrative only as distinct from a marketing communication.

**Personal Data or PD:** has the meaning set out in the Data Protection Legislation and shall include Special Category Data (as applicable).

**Service Provider(s):** refers to a Third Party with whom We work with from time to time as a necessary part of providing Our Services and with whom We may need to share Your PD.

**Special Category Data:** has the meaning set out in the Data Protection Legislation.

**Supported Person:** refers to the frontline NHS COVID-19 worker who has signed up to avail of the therapeutic services available from the Volunteers.

**Technical Data:** refers to that at Clause 1.5 which is capable of being considered PD.

**Third Party:** refers to a Data Processor or Data Controller with whom We may need to share Your PD. This includes Service Provider.

**Volunteer:** refers to the therapist who has signed up to the Frontline19 Member Network.

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