



ICARUS

Immediate Care, Assessment & Rehabilitation for Uniformed Services

Privacy Policy

ICARUS takes your privacy very seriously and we are fully committed to ensuring that it is protected. You need to be confident that your personal information will be kept safe and secure and will only be used for the purpose for which it was given to us.

We want to be transparent about what personal information we collect and process and we aim to describe our privacy practices in a way that is easy to understand so that you can make an informed choice regarding this.

In this Privacy Policy we explain how we collect and use the personal information of people who visit our website and give us their information via telephone, letter, email, text/messaging service or face to face. If you do not agree to the following policy you may wish to cease using this website and/or refrain from submitting your personal information to us.

We update this Privacy Policy regularly to ensure that it continues to comply with the latest regulations and best practice. This policy was last reviewed and updated on **24 August 2021**.

About us

ICARUS is a Scottish Charitable Incorporated Organisation (SCIO), Charity Registration Number SC049263. Our registered office is Third floor, 3 Hill Street, New Town, Edinburgh, EH2 3JP.

We adhere to current data protection legislation, including the General Data Protection Regulation (GDPR) and Privacy & Electronic Communications Regulations (PECR).

ICARUS is registered as a data controller with the Information Commissioner's Office (ICO) under the Data Protection Register and our registration number is ZB032420.

Our Data Protection Officer is David Bellamy, CEO and he can be contacted by email at david@icaruscharity.org.

Why we collect and use personal information

By law ICARUS must have a legitimate basis for processing personal information. We collect and use personal information so that we can provide effective, safe, ethical and responsive care and treatment. We will also use personal information to check and review the quality of the care and treatment we provide. This helps us to improve our services to you.

What personal information we collect

We collect the following types of information:

Personal information: This includes, but is not be limited to, full name, postal address, telephone numbers, email address, date of birth, emergency contact and GP details.

Special Category information: Given the nature of the care and treatment that we provide, it is important that we have some more sensitive information. This includes, but is not be limited to, details



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of mental and physical health, alcohol intake, use of prescribed and non-prescribed drugs, any criminal offences or alleged offences. It could also include relationship or sexual history, sexual orientation, family details, lifestyle, employment details, religion or cultural background.

Technical information: This is data we automatically collect when users visit our website. This includes, but is not be limited to, IP addresses, browser type and version, operating system and platform. We also collect information about user visits including, but not limited to, which web pages were visited, length of visits to certain pages, page interaction information and methods used to browse away from pages. This type of information could also include contact preferences.

How we collect personal information

We collect information in a number of ways:

Directly: Where information is provided directly by you via telephone, letter, text, email or otherwise and/or through treatment sessions.

Through our website: Our website uses cookies to provide a better user experience. Please refer to our Cookie Policy for more information. We also use Google Analytics to collect information about how people use our website and how it performs during their visit. It gathers the technical information outlined above. However, this information is processed in such a way that it does not identify individuals. We do not store personal information (eg name or address) through Google Analytics and we do not make, and do not allow Google to make, any attempt to identify users visiting our website. Google Analytics also uses cookies. You can disable cookies by selecting the appropriate settings in your internet browser. This will stop Google from collecting and processing information.

Contact forms and email links: So that we can respond to enquiries, we collect names, email addresses, telephone numbers and any messages received by through the completion of contact forms on our website or the use of our email link.

Other sources: On occasion, with prior knowledge and consent from you, we collect personal information that is shared by third parties, eg family member, partner, friend or other healthcare providers.

How we use personal information

We use your personal information for the following purposes:

- To ensure the care and treatment we provide to you is properly responsive to your individual circumstances and needs and to ensure that we make safe and effective therapeutic decisions.
- To assist us in administering our website, to ensure that content is presented in the most effective manner and to help with keeping our site safe and secure.

How we store personal information

To manage and store your personal information we utilise a cloud-based practice management system called **WriteUpp**. This system enables us to efficiently store any information in a way that ensures



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adequate security and only allows people who have the right level of authority to access your personal information. It also provides protection against accidental loss, destruction or damage.

For more information concerning WriteUpp, its privacy policy and conditions for processing your personal information please go to www.writeupp.com/privacy-policy/.

The information generated by the Google Analytics cookies about the use of the website will normally be transmitted to and stored by Google. Google has certified their compliance with the EU-US Privacy Shield Framework and as such they provide a guarantee to comply with European data protection law.

For more information about Google Analytics' terms and conditions of use and data privacy please go to www.google.com/analytics/terms/us.html and www.google.com/analytics/learn/privacy.html.

All personal information provided to us via our website is stored on our secure servers. Unfortunately, no transmission of information via the internet is completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of the data transmitted to our website. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

How long we keep personal information

Where you receive treatment from us, we will keep your personal information in our secure case management database for at least seven years from the date of the last treatment.

If you want us to stop holding your personal information at any time, you can contact us and request that we stop processing your data. Please refer to "Your Rights" section of this Privacy Policy.

The data sent and linked to the Google Analytics cookies, will be automatically deleted after 50 months. The deletion of data whose retention period has been reached is done automatically once a month.

Sharing personal information

We will never sell, rent or trade your personal information with other charities or businesses for marketing purposes.

We will share your personal information where you have given your permission for us to do so or we are under a duty to disclose or share personal data in order to comply with a legal obligation. The following situations require us to share information without your consent:-

- **Court Order:** We are obliged to disclose information under a Court Order.
- **Child Protection:** Where there are concerns about the welfare of a child and child protection issues relating to potential physical, mental or sexual abuse or serious neglect.
- **Risk to self or others:** Where there is an imminent risk of serious harm to you or harm or exploitation of others. If you are seeking help and you are perpetrating a serious crime against someone or you are actively suicidal, we are unable to protect your right to privacy. We must take appropriate action to protect the rights of children and vulnerable adults if we believe they are at risk.

Third Floor, 3 Hill Street, New Town, Edinburgh EH2 3JP

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Registered Charity Scotland: SC049263 Company Number: CS003978



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We do share information with analytics and search engine providers, such as Google, that assist us in the improvement and optimisation of our website.

Your rights

You have a number of rights when it comes to your personal information:

Right of access: You have the right to request access to the personal information that we store and process about you.

Right to correct: You have the right to have any errors or mistakes in your personal information corrected.

Right to restrict: You have the right to restrict the processing of your personal information.

Right to object: In some circumstances, you have the right to object to the processing of your personal information. You are not able to object when information is legitimately shared for safeguarding reasons. In certain situations, to protect people from harm, it is a legal and professional requirement to share information.

Right to portability: You have the right to have your personal information provided to you in a portable format.

Right to erasure: In most circumstances, you have the right to have your personal information deleted. However, it may not be possible to delete your information if there is a legal obligation to retain it. We will inform you of the basis of any such decision not to delete information as appropriate.

To exercise any of the above rights, please email our Data Protection Officer

Complaints

If you have a complaint about the way we handle your personal information, please contact our Data Protection Officer.

If you want to make a formal complaint about the way we have processed your personal information you can contact the ICO which is the statutory body that oversees data protection law in the UK. For more information, go to www.ico.org.uk/make-a-complaint.

Changes to our Privacy Policy

Our Privacy Policy may be updated from time to time, so please check back frequently to see any changes.