



The MQ Foundation

Privacy and data protection

(for US audiences)

Introduction

The MQ Foundation is a wholly independent partner of UK-based **MQ: Transforming Mental Health**. The MQ Foundation (or “MQF”) is based in New York and is a non-profit public charity registered with the Internal Revenue Service of the United States Government and recognized as a 501c3 tax-exempt organization with the tax ID number (EIN) 82-3922797. In working with MQ: Transforming Mental Health on research, advocacy and fundraising activities, the MQ Foundation makes every effort to be compliant with relevant privacy and data protection policies of the United Kingdom, European Union and the United States.

MQ: Transforming Mental Health is a registered charity in England and Wales (1139916) & Scotland: (SC046075) and a registered company in England and Wales (7406055).

The term “MQ” as used in this document refers to both organizations.

MQ is committed to protecting your privacy and security as well as being transparent about how we intend to store, use and share your information. This policy explains how and why we use your personal data, to ensure you can make informed choices and be in control of your information at MQ. Our practices are aligned with the General Data Protection Regulation (GDPR), which replaces the Data Protection Act 1998, and will come into effect on 25 May 2018, and the existing ePrivacy regulation, called the Privacy and Electronic Communications Regulation (PECR) and the EU-US Privacy Shield’ enacted 12 July 2016.

MQ’s accountability

As part of MQ’s induction process, all staff and volunteers sign a confidentiality agreement and in so doing agree to follow regulatory practices and this policy. New staff receive training in data protection to maintain best practices at MQ and we have refresher training on an annual basis.

Any staff member’s behavior which breaches this policy and regulatory requirements alike, will be taken very seriously by MQ and will be subject to investigation and disciplinary action where appropriate.

What this policy covers

- What ‘processing’ means
- What database we use
- Why we need databases
- Why do we collect your information?
- What information do we collect?

- How we collect your information
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1. Useful information

1.1 What 'processing' means

'Processing' is the action that MQ, or a trusted third party, takes when collecting, updating and uploading an individual's personal information to produce meaningful information which helps MQ to grow and develop. This information is used to administer your account on our database and helps MQ to deliver best practice and the best experience for you.

1.2 What database we use

In the United Kingdom, MQ uses a database called Raiser's Edge – a software owned by Blackbaud – which is a 'Customer Relationship Management' system. It is used by many other charities and designed to ensure that people's personal information is safely and securely recorded in one central system.

In the United States, the MQ Foundation is evaluating data base needs; in the interim, personal data is safely stored in a password protected and encrypted bespoke database.

1.3 Why we need databases

Having databases, like Raiser's Edge, makes it easy for us to confidently deliver effective and efficient support in ways that you are happy with. It also facilitates our commitment to being transparent, compliant and holds us to account.

2. Collecting information about you

2.1 Why we collect your information

At MQ, we would like to build long-lasting relationships with you based on trust, transparency and compassion. Processing your information helps to fulfil our aim of maintaining a robust internal database and adhere to best practices whereby your information and preferences are kept up to date.

Your information enables us to understand you better and be more appropriate when communicating with you. For instance, we are able to recognize and acknowledge your support and the commitment you show towards MQ over the years.

In turn, this better equips us to handle enquiries, deliver materials and process payments. However, above all, it facilitates us in providing quality support.

2.2 Information we collect directly from you

We may collect information directly from you whenever you come into contact with MQ. For example, when you contact MQ about our activities, sign up as a supporter, send or receive information, engage with our social media or donate – you provide us with your personal information at your discretion. In so doing, we may wish to record this onto our database which helps us to stay aware of you and how you're supporting us.

- **Personal details:**
 - Your name, email, address, telephone etc. when you sign up as a supporter
 - We may also collect date of birth, age and/or gender where appropriate (e.g. when registering for an event or completing a supporter survey)
 - Perhaps you have shared your own experience of mental health and have given us permission to store this information and/or share it
 - Your dietary and accessibility requirements when attending an event
- **Financial information:**
 - All financial information is encrypted
 - Your bank account details for cash donations (such as direct debits or credit card details) and invoices from suppliers for instance
 - Your Gift Aid Status for claiming gift aid in the UK
- **Details of your interests:**
 - Your information from campaigns you have signed up to, events or activities you have registered for or how you have interacted with our content
- **Your contact preferences:**
 - You can tell us how you'd like to be contacted and through which channels. You can be as selective as you wish in order to help us get this right for you

In order to ensure accuracy of your data MQ can only take reasonable steps to create an accurate record for you. However, we look to you for ensuring the on-going accuracy of your personal data is correct.

We encourage you to take responsibility for reporting personal data amendments by contacting MQ. For instance, applicants for MQ funding via <https://flexigrant.mq.org> have responsibility for updating their personal data directly by logging in to their account online. It can take up to 21 days for these changes to come into effect.

Under data protection law, certain categories of personal information are recognized as sensitive personal data (such as information relating to health, beliefs or political affiliation). In limited cases, we may collect sensitive personal data about you, for example your experience of mental health.

We only collect this sensitive personal data if there is a clear reason for doing so. For instance, some of our supporters give in memory of a loved one, perhaps someone they have sadly lost to suicide. We would like to note this on their record to make sure we are sensitive to this and give the right support.

Whatever sensitive information we do hold, we will never share unless we have your explicit consent.

2.3 Information we collect indirectly from you

2.3.1 We may also receive information when you interact with third parties working on MQ's behalf. For example, if you apply for an MQ funded research grant (through Flexigrant), make a donation to MQ or fundraise for MQ through third-parties (such as, Everyday Hero, Just Giving or Network for Good) we will process this information in accordance with your contact preferences.

2.3.2 We may use publicly available information to add to what we already know about you. We want our communications and events to be relevant and tailored to your background and interests, and sometimes may use publicly available information to achieve this.

2.3.3 We may collect information when you visit our website or interact with our content. For example, we may collect information about how you interact and engage with MQ's content and adverts on our website as well as social media. You can find more information below on cookies.

3. Using your information

3.1 Why your information is important to us

Your information helps us to fulfil the following activities:

- Update and enhance our internal database systems to deliver excellent supporter care and positive experiences with MQ
- Effectively manage relationships that recognize and are responsive to your support, reflecting the information you have shared with us
- Use your expressions of interest to provide you with the information you need to make informed decisions
- Proficiently manage feedback and/or complaints which are also used in relevant ways to improve best practice
- Minimize any unwanted communications you receive from MQ

3.2 Your information and marketing tools

3.2.1 How we combine and analyze information

We are committed to carefully managing our communications to make sure you only hear from us in a way that is right for you. To help us do this, we may:

- Combine the information we collect about you and analyze what we know about your interests, preferences and potential level of support or donation
- Combine information from different sources which helps us to better understand our supporters, improve our relationship and provide a better experience of interacting with MQ
- Compile information relating to your engagement with MQ (financial and otherwise)

- Collate and analyze information you provide us with to improve our understanding, create bespoke communications and develop effective approaches when asking for support from like-minded prospect individuals and other organizations
- Use analysis tools which help us to understand how our website is being used and how we can improve the content and operation of it

You can opt out of your data being combined and analyzed, more information is provided in the section ‘How you can change your marketing preferences.’

3.2.2 US and UK data

As described in section 3.2.1 and throughout this document, MQ uses data to work more efficiently and effectively for our Users. There are many aspects of data collection and management that simply work better together – for example grant applicant information or our newsletter sign-up forms. However, because of differing national and regional regulations regarding charitable gifts, the MQ organizations do not combine donor data bases.

3.2.3 Research and profiling

At times, we may also use publicly available information to help us communicate more specifically with like-minded people who may share the same interests in our work as you do.

In addition to obtaining information from publicly available data sources, we may also work with trusted third parties; such as, Prospecting for Gold and Wealth Watch to highlight people who may be interested in giving a significant gift to MQ.

Such sources anonymize your data so that it does not identify you as an individual. For example, it uses existing information, such as postcodes, to provide demographic information like the average age, income and charitable giving in any given area across the UK.

This knowledge helps MQ to reach out to new supporters who may wish to support us in our goals and mission. For instance, it can help to direct advertisements and other communications to people who share similar interests as you.

We also conduct due diligence on existing and potential supporters to ensure that MQ will not suffer reputational damage. For example, we would not wish to accept a donation from someone who has been at the source of causing people harm, or who is involved in activities which conflict with MQ’s values, vision and mission.

3.2.4 Cookies and Google Analytics

Cookies are text files placed on a computer which collect visitor behavior information. Google uses cookies and we use their web analytics service called Google Analytics to help us to monitor how people use our website. It creates statistical reports that allow us to learn more about what people are interested in or what isn’t working so well. This facilitates us to improve interactions. This also helps us to personalize the content and adverts you see.

You can opt-out of cookies but are required to do this proactively by changing the setting in your browser – unfortunately, we cannot control this on your behalf. We do have a [cookies policy](#) if you’d like to read more about this.

- You can find out how to turn off cookies by visiting aboutcookies.org or www.allaboutcookiges.org

- You can always opt-out of Google Analytics cookies by [Google's opt-out tool](#)

3.2.5 Other marketing tools

We may contact you for marketing purposes by post, email, text message or phone. If you have agreed to be communicated with in any of these ways this will be processed so that we can adhere to your preferences.

Where we have consent, we may do digital advertising. For this, information such as your email address or mobile phone number will be sent in an encrypted format to digital advertising networks or social media companies such as Facebook, Instagram, Twitter or YouTube.

We provide information about how to change your marketing preferences below.

4. Consent

4.1 Why consent is important to both you and MQ

MQ is committed to being clear and transparent about how we might use your data in future when it is provided. We strive to provide practical and easy ways for people to change their contact preferences and information during all interactions.

By disclosing personal information to MQ you are consenting to the collection, storage and processing of information in the manner described in this policy, unless clearly stated otherwise.

MQ will provide all individuals, existing supporters and applicants with the control to manage their contact preferences at the point that information is provided.

There are times when even if you have 'opted out' of our communication we may be required to contact you. This is known as "legitimate interest" and applies when we need to convey something of importance to you. This would usually be about something that is directly related to you. We will do our best to have as minimal impact on your personal privacy as possible. For instance, if you are a MQ funded researcher, and we need to update you on your funding, or need to receive information from you about your study.

4.2 Your rights

We want to inform you of your rights when it comes to your information and we would like to help you to better understand them. These are:

- **The right to object.** You always have the option to stop receiving information from us across all of our communication channels. This is at your discretion and we will respect your choice. However, for us to enact this we encourage you to notify us
 - **Details of how to do this can be found on all of our communications and within this document**
- **The right to access a copy of the personal data we hold.** You, or an organization with legal purpose, can request a copy of your personal data for legitimate purposes. This is known as a 'Subject Access Request' and you can request this by emailing supportercare@mqmentalhealth.org for supporters in the UK or info@mqfoundation.org for supporters in the US.

- Please note that proof of identity and the reason for your request, will be necessary for MQ to respond appropriately. We may ask for further details if needed
- **The right to be “erased”.** This where you can request MQ to delete the data we hold on you. Please note that this will not apply if there is lawful duty for us to continue to use the data we hold about you
- **The right to rectify inaccurate data.** As detailed above you can make corrections to the data we hold about you
- **The right to object to your data being used for marketing.** You can find more information about how to opt out of marketing communications below

4.3 Managing your preferences

Our Supporter Promise sets out our commitment to honoring your preferences. If you do not wish us to use your personal data for the marketing purposes outlined in this policy, you can always opt out.

It's important to know that if you tell us that you do not want to receive marketing communications, we will maintain your details on a suppression list to ensure we do not continue to contact you. However, there may still be reasons we need to get in touch for administrative purposes, including (but not limited to):

- Processing a donation you have made and any related Gift Aid
- Providing you with information you need to participate in an event (e.g. a race)
- Responding to a query you have made
- Explaining or apologizing where we have made a mistake

To change your marketing preferences, you can:

- Indicate that you do not wish to receive marketing communications by either clicking the 'unsubscribe' link included at the bottom of every email we send or ticking the 'opt out' box in all our postal communications
- Ask us to stop sending marketing texts by sending an 'opt-out' message, following the instructions provided in the marketing texts you receive
- Opt out of digital advertising that we control directly, however, please note that this will not stop advertisements being shown to you on a random basis or based on cookie data that we don't control
- Directly contact our Supporter Care Team by email supportercare@mqmentalhealth.org or phone 0300 030 8100 in the UK or, in the US you can email the MQ Foundation at info@mqfoundation.org or complete our contact form. You can also write to us at:

Supporter Care, MQ Foundation
 MQ Foundation
 598 Madison Avenue, 3rd Floor
 New York, NY 10022

Alternative ways that you can opt out of nationwide marketing, including receiving things from charities like MQ, are also below for your reference.

Mail and Email

- Consumers can register at the Direct Marketing Association's (DMA) consumer website: www.DMAchoice.org for a processing fee of \$2 for a period of ten years. Registering online is the fastest way to see results. DMAchoice offers consumers a simple, step-by-step process that enables them to decide what mail they do and do not want. In addition, DMAchoice online offers registration for DMA's [eMail Preference Service](#) (reduce your unsolicited commercial email);
- **Mail-in registration:**
If you do not wish to complete your registration online, you can register for DMAchoice by using the mail-in form that is online: fill out the [DMAchoice Mail In Form](#) with all required information, print it and mail to the address below.
- Or, if you do not have access to the Internet, you can register by sending your name and address (with signature), along with a \$3 processing fee (check or money order payable to DMA) to:

DMAchoice
DMA
PO Box 900
Cos Cob, CT 06807

5. How we protect data

MQ recognizes that privacy is important to our supporters, funding applicants and other contacts. The information submitted or collected by MQ will be kept confidential and secure. We will take all reasonable measures to ensure we keep your information secure, accurate and up to date, and store it only for as long as is reasonable and necessary.

Information will be processed only by MQ data controllers, or on our behalf under strictly regulated conditions and in line with the provisions of data protection laws. MQ data controllers are members of staff who have access to our databases or data storage systems and have received data protection training.

We will take all appropriate security measures to ensure any platforms related to MQ have gone through a quality control process to ensure security. However, given the nature of the internet we cannot guarantee complete security.

6. Our work with third parties

6.1 Third Parties within the UK and EU

For operational reasons, or in order to meet specific requests, data may also be processed on MQ's behalf by external organizations. In these instances, data will be handled under strictly regulated conditions and in accordance with the data protection and security regulations.

Third parties will only handle MQ's data once we have screened their best practice policies and reviewed their:

- Methodology for being compliant with regulations
- Processes for monitoring quality control
- Methodology of conducting due diligence

They will also need to have signed both a 'Service Level Agreement (SLA)' and confidentiality agreement called an 'Non-disclosure Agreement'.

We will never sell your details and will only share your details with third parties (who are not working with us directly) with your explicit consent.

We will only disclose information in one or more of the following circumstances:

- Where consent has been obtained
- Where there is a legal obligation
- Where there is a public duty (e.g. legal reasons)
- In connection with the transfer of all or any of rights and obligations to a third party (for example if we merged with another organization)

6.2 Third Parties in the USA and the rest of the world

When we work with third parties based outside of the EU/ EEAU we conduct due diligence to the same high standard.

An example of this is our work with Blackbaud who is based in the USA and provides our Customer Relationship Management (CRM) system, called Raiser's Edge. We use this to manage supporter's personal information so that we can keep in touch in ways that are specified.

We also ensure that the organization, such as Blackbaud, comply with the USA's version of data protection regulations which is called the 'EU-US Privacy Shield' enacted 12 July 2016. It contains stronger privacy requirements and replaces the 'Safe Harbor' framework.

All third parties that we work with are compliant with the standards of the Privacy Shield framework.

7. Monitoring vulnerability

7.1 Children and Young People

It's important that children and young people can share their experience and views on mental health, and we are committed to ensuring real life experience guides our work and priorities.

If a child, or young person under the age of 18, wants to interact with MQ in the UK by joining our Young People's Advisory Group (YPAG) or by sharing their story, we require pre-consent from their parent or guardian.

We believe that it is important to protect and respect the rights of all individuals in relation to their personal data but would seek the parental or guardian consent before featuring photos or the story of a child aged under 18.

7.2 Safeguarding

MQ is committed to protecting all individuals by putting appropriate measures in place which prevents harm or damage.

Our work in mental health does mean that we come into contact with people who may be vulnerable in different ways. MQ takes this responsibility very seriously and we try to ensure that people feel comfortable to raise any concerns should they arise.

We are also committed to training staff whose role is related to working with people from outside of MQ. This can include, donors, YPAG members and case stories.

If you would like to have a copy of our internal Safeguarding Policy, please do contact us directly.

8. Changes to MQ's privacy and data protection policy

We keep this policy under regular review and it may change from time to time. For example, we will be updating it to reflect any new legal requirements set out in the ePrivacy regulation, the Privacy and Electronic Communications Regulations (PECR), which is expected to be updated by 2019.

Please visit this webpage to keep up to date with any changes to our privacy policy.