Data Privacy Notice & Cookies Policy – 19 Wilson Patten

September 2025

1) Your Privacy

- Wilson Patten Services Ltd, (T/A 19 Wilson Patten) a company limited by guarantee registered in England and Wales (registered company no: 16534246). Our registered office address is: 19 Wilson Patten Street, Warrington, WA11PG. Our ICO Registration number is ZA760932.

This website www.19wilsonpatten.com (the "website") is operated by Wilson Patten Services Ltd. Wilson Patten Services Limited is the data Controller for personal data processed for professional services and visitors to 19 and 21 Wilson Patten Street.

This Privacy Notice describes how Wilson Patten Services. ("*WPS*" "*we*," or "*us*") collects, uses, and discloses information about you. This Privacy Notice applies when you use our products and services, including our offices, , communications and websites (collectively, our "*Services*"), or otherwise interact with us, such as through our customer support channels or on social media pages. This privacy notice (together with our website terms and conditions) sets out the basis on which any personal data we collect from or about you, or that you provide to us, will be processed by us. This notice includes our cookies policy for the website.

Our group Data Protection Officer is Jen McDonald. If you have any questions about the content of this notice you can contact us at:

Wilson Patten Services Ltd.
19 Wilson Patten Street
Warrington, Cheshire
WA1 1PG
Tel: 01925 483069

Email: enquiries@19wilsonpatten.com

2) Your rights regarding your personal data

Under data protection law, you have rights we want to make you aware of. The rights available to you depend on our reason for processing your information and may only apply in certain circumstances. You can check the Information Commissioners website for more detail or contact the DPO.

- Your right to be informed – This notice informs you what data we collect and how we use it.
- Your right of access – You have the right to ask us for a copy of your personal information and an explanation of why we are using it.
- Your right to rectification - You have the right to ask us to correct information about you which you think is inaccurate or incomplete.
- Your right to erasure - This is known as the 'right to be forgotten' and you have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to limit the processing of your information.

- Your right to object to processing - You have the right to request we stop processing some or all or your data.
- Your right to data portability - You have the right to get your personal data from us in a way that is accessible.
- Rights around automated decision making and profiling – where decisions are made about you without people being involved, though we don't use your data in this way.

If you contact the company requesting access to the data we hold about you, this is called a subject access request. If you make a subject access request, you are not required to pay a charge for doing so, although there is an administration fee of £20. We generally have one month within which to respond to your request. Subject access requests should be made via email in the first instance via enquiries@19wilsonpatten.com. You will be sent a Subject Access Request form for completion in writing. You will also be asked to provide copies of relevant documentation (e.g. name, address, date of birth, contact details, driving licence, passport, birth certificate) in order to verify your identity.

Please contact our Head Office on 01925 483069, or email us at enquiries@19wilsonpatten.com if you wish to make a request with regard to any of your data rights.

If you are happy for your data to be used for the purposes described in this privacy notice, then you do not need to do anything.

3) The Data We Collect

We will process personal data from the following categories of people visiting and using this website or using Wilson Patten services:

i. Website visitors and users (cookie data and any personal data you choose to send us when filling in forms on the site).
ii. Potential and existing clients (any personal data you send or is sent to us by a third party on a referral form or communicated to us subsequently. This includes any letter or any other document, email, communication or message, including health details).
iii. Payments (any personal data you include when making a payment or setting up a direct debit, including your financial details).
iv. Training and conferences applicants and attendees (any data you submit when applying or paying for a training course, including financial details).
v. Job seekers and prospective volunteers (any personal detail you submit in your application, including education and employment history and optional diversity monitoring data).

4) Our lawful bases for the processing

We rely upon various lawful bases, as set out in the GDPR, to collect and use your data;

- 6.1.a **Consent:** with your clear and informed consent and for a specific purpose or purposes.
- 6.1.b **Contract:** as necessary for a contract, or to enter in to one with you.
- 6.1.c **Legal obligation:** where necessary for us to comply with the law
- 6.1.d **Vital interests:** the processing is necessary to protect someone's life
- 6.1.e **Public task:** where we are performing a task in the public interest, usually this applies to data processing for research purposes.

- 6.1.f **Legitimate interests:** where the processing is necessary for our legitimate interests but only where is does not override your rights and freedoms.

It is in the legitimate interest of Wilson Patten Services to collect and process data about you and your usage of the website, in order to evaluate use, ensure that the information and resources provided are useful, and to identify areas for improvement.

It is in the legitimate interest of Wilson Patten Services to collect and process data from people wishing to join any mailing list, submit a job application, submit a request or referral for use of our services. We also rely upon Legitimate Interest to process CCTV data at our Warrington site. We do not believe that this processing will have an adverse effect on your rights as a data subject.

Where we collect Special Category personal data, particularly sensitive or private information such as ethnicity, or health information, we rely on an additional lawful basis.

We generally rely upon your explicit consent (Art 9(2)(a)) to process this information, or, where the processing is necessary for the purposes of the provision of health or social care or treatment (9(2)(h), and for research purposes (9(2)(j), with the relevant condition in the Data Protection Act 2018.

5) How we keep, process and dispose of your personal information

Every member of staff who works for Wilson Patten Services has a professional and legal obligation to keep information about you confidential. We keep your personal information securely. The information you provide will only be used for the purpose(s) specified when it was collected; such as to supply you with the goods or services you have requested and/or to keep you informed about upcoming Wilson Patten Services activity.

We are committed to protecting your privacy and will only use information collected lawfully in accordance with:

- Data Protection Act 1998 and General Data Protection Regulation 2016
- Human Rights Act 1998
- The UK General Data Protection Regulations (UK GDPR)
- Common Law Duty of Confidentiality
- Health and Social Care Act 2012

We do not routinely disclose your information to any third party without your permission unless legally obliged to do so. There may be some exceptional circumstances where information is disclosed (i.e. situations where we legitimately believe you or others may be at significant risk of harm, where we legitimately believe a crime is being or has been committed or other legal investigations). We may share information where the law requires that information to be passed on and/or in accordance with the information sharing principle following Dame Fiona Caldicott's information sharing review where *"the duty to share information can be as important as the duty to protect patient confidentiality"*.

Data retention

We keep your data for various lengths of time, depending on the purpose it was collected for. Financial data is retained for 6 years. If you sign up to a mailing list or newsletter, we will retain your data until you unsubscribe from the list. Training and events data is kept until after the event. Job applications are retained for 6 months or for 6 years after you leave employment

if your application is successful. Requests for services are retained for 6 months, unless you use a service, in which case it will be retained while you use the service and for a period of up to 2 years after that.

Partner organisations

We work in partnership with and for various organisations and we may be the Controller, a Processor or a joint Controller of personal data used for services and activity delivered in partnership.

Third party organisations

We use third parties to collect and process payments and other data submissions to the website. We have contracts with the organisations to ensure that you data is used appropriately and held securely by them on our behalf.

We use iZettle (a Paypal company) secure payment for credit and debit card payments onsite for the purchase of goods and services. iZettle may ask for your name, address, phone, email address, and credit/debit card information. Your card details will only be retained by iZettle. Their website has their privacy statement is available at iZettle privacy policy

We use Stripe secure payment pages for credit and debit card payments online for the purchase of goods and services. Stripe asks for your name, address, phone, email address, and credit/debit card information. Your card details will only be retained by Stripe. Their privacy statement is available at Stripe's privacy notice.

Online forms may be protected by Google reCAPTCHA v2. This ensures the form is completed by a real person and not automated software, to protect systems against abuse. Data captured by Google will include information such as IP address, length of page visit, mouse movements. Google reCAPTCHA is covered by Google's privacy policy and terms.

Wilson Patten uses Microsoft Office 365 for email and other office data functions. Personal data such as email addresses may be processed using Microsoft Office 365. As part of the Office 365 suite, Wilson Patten uses Microsoft Forms to capture data. Microsoft's privacy policy can be found here Microsoft privacy notice.

People who contact us through our website or send emails

We monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. Wilson Patten uses TLS, a standard encryption protocol, for its electronic communications and attachments. However, Wilson Patten does not guarantee that the integrity of any email communication has been maintained nor that email communication is free of viruses, interceptions or interference.

We may use Egress Switch https://bit.ly/2Lj0luu to encrypt and protect certain email traffic. This may also involve the use of use Transport Layer Security (TLS) to encrypt and protect email traffic. If your email service does not support TLS, you should be aware that any emails we send or receive may not be encrypted in transit.

6) Visitors to Wilson Patten Offices

Visitors to Wilson Patten offices are asked to sign in and out at reception and show a form of ID. The ID is for verification purposes only, we do not record this information. Our visitor records are kept for a short period of time unless an incident occurs, or an issue is identified that requires investigation (e.g. a health and safety incident).

Closed-circuit television (CCTV) operates outside the building for security purposes. Where CCTV is in use, there are signs in place to notify individuals. The images captured are securely stored and only accessed on a need-to-know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation. The purpose for processing this information is for security and safety reasons. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

We have Wi-Fi on site for the use of guests. We will provide you with access to the address and password. We record the device address and will automatically allocate you an IP address whilst on site. We also log traffic information in the form of sites visited, duration and date sent/received. We don't ask you to agree to terms, just to the fact that we have no responsibility or control over your use of the internet whilst you are on site, and we don't ask you to provide any of your information to get this service. The purpose for processing this information is to provide you with access to the internet whilst visiting our site. The lawful basis we rely on to process your personal data is article 6(1)(f) of the UK GDPR, which allows us to process personal data when its necessary for the purposes of our legitimate interests.

7) Clients using Wilson Patten Services

Our staff maintain records in order to provide you with the best possible services. These records may be electronic, on paper, or a mixture of both. We use a combination of working practices and technology to ensure that your information is kept confidential and secure. The processing of this information (including special category data e.g. health) is necessary for Wilson Patten to comply with the law and to ensure our health and safety responsibilities are met.

8) Questions & Complaints

If you have any questions or concerns about how we are processing your data you can contact us via email at enquiries@changingmindsuk.com, or via telephone on 01925 483069.

If you are not satisfied with our response, and wish to make a complaint about our data processing activity you can also contact the Information Commissioner's office.

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint and to check on the level of service we provide. We may compile and publish statistics showing information like the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for two years from closure.

9) Rectification of Data

It is important that you tell Wilson Patten if any of your details such as your name or address have changed, or if any of your details such as your date of birth is incorrect, in order for this to be amended. You have a responsibility to inform us of any changes, so our records are accurate and up to date.

10) Amendment of this policy

We regularly review this privacy policy and may amend the content or wording from time to time to ensure it remains relevant and effective. You can see when it was last updated by checking the date at the end of the notice. The published version will be the applicable version.

Last Reviewed: 1st September 2025

Cookies Policy - Wilson Patten UK – v2

1st July 2025

1) Introduction

Our website uses cookies. A “cookie” is a small text file that is placed on a website user’s device/computer hard drive by a website.

Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

2) About Cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

Cookies can be used by web servers to identify and track users as they navigate different pages on a website and identify users returning to a website.

3) Our Cookies

We use a range of cookies and similar technologies on our website to enhance your experience, analyse traffic, provide website and data security and support essential site functionality. This section explains what we use and why.

Google Analytics

We use Google Analytics to help us understand how visitors use our site. Google Analytics sets cookies to collect information such as pages visited, time spent on pages, and links clicked. This data is aggregated and anonymised, helping us improve our website content and performance.

Google Maps Embeds

Some pages include embedded Google Maps (via iframe), which may set cookies or collect data about your interaction with the map. These are governed by Google’s own privacy and cookie policies.

File Upload Features

We use a drag-and-drop multi-file upload component developed by Glen Don L Mongaya. While it does not set cookies directly, it may rely on local browser storage or session data to handle multiple file uploads smoothly.

Smash Balloon Instagram Feed

Our site integrates Smash Balloon to display our Instagram feed. This may use cookies or connect to Instagram's servers, which can track your viewing of embedded content in line with Instagram's data practices.

Google Fonts (Self-Hosted)

For typography, we self-host Google Fonts on our server. This means no direct requests are made to Google's servers when loading fonts, so Google does not set additional cookies or receive tracking data through fonts on our site.

Wordfence Security

We use Wordfence to help protect our website from malicious activity. Wordfence may set cookies to identify trusted visitors and block attackers, enhancing the security of our site.

Yoast SEO

Yoast SEO is used for managing search engine optimisation. It does not set cookies for site visitors, but it does help us structure our content to perform better in search results.

WordPress

We can at times use a third-party service, WordPress.com, to publish certain news items or notices on the website. These sites are hosted at WordPress.com, which is run by Automattic Inc. We use a standard WordPress service to collect anonymous information about users' activity on the site, for example the number of users viewing pages on the site, to monitor and report on the effectiveness of the site and help us improve it. WordPress requires visitors that want to post a comment to enter a name and email address. For more information about how WordPress processes data, please see Automattic's privacy notice.

4) Managing cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- https://support.google.com/chrome/answer/95647 (Chrome)
- https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences (Firefox);
- https://help.opera.com/en/latest/security-and-privacy/ (Opera);
- https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies (Internet Explorer);
- https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac (Safari); and
- https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy (Edge).

Blocking or deleting all cookies may have a negative impact upon the usability of many websites.

If you block or delete cookies, you may not be able to use all the features on our website.

5) Cookie preferences

You can manage your preferences relating to the use of cookies on our website by adjusting your consent when you visit our website for the first time. You may also click Manage Consent at any time, which is found at the bottom left of your device.

6) Our Details

This website is owned and operated by Wilson Patten Ltd.

Our principle place of business is: 19 Wilson Patten St, Warrington, Cheshire, WA1 1PG.

You can contact us:

- By post, using the postal address above
- Using our website contact form
- By telephone, on the contact number 01945 483069
- By email, using the email address enquiries@changingmindsuk.com