



Promoting Recovery from
Drug and Alcohol Misuse

MID AND EAST Lothian Drugs (MELD)

MELD PRIVACY POLICY

If you are a MELD client, or just visiting our website, this policy applies to you.

Our responsibilities

If you are a registered MELD client or a visitor to our website we act as the 'data controller' of personal data. This means we determine how and why your data are processed. We are registered as a data controller at the UK Information Commissioner's Office under number ZA886756.

Your responsibilities

- Read this Privacy Policy
- If you provide us with personal information about other people, or if others give us your information, we will only use that information for the specific reason for which it was provided to us. By submitting the information, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

When and how we collect data

From the first moment you interact with MELD, we are collecting data. Sometimes you provide us with data, sometimes data about you is collected automatically.

You give data when:

- You raise an enquiry through the website
- You call us or we call you
- You use MELD services
- You receive letters/texts/calls from us
- You view and sign documents
- You chat with us for support

We collect Data when:

- You browse any page of our website
- You raise an enquiry through the website
- You call us or we call you
- You use MELD services
- You receive letters/texts/calls from us
- You view and sign documents
- You chat with us for support

Types of data we collect

Contact details

Your name, address, telephone number, email address...

Data that identifies you

Your IP address, time zone setting, geolocation information about where you might be, operating system and version.

Data on how you use meld-drugs.org.uk

Your URL clickstreams (the path you take through our site), services viewed, page response times, download errors, how long you stay on our pages, what you do on those pages, how often, and other actions.

What about really sensitive data?

We don't collect any "sensitive data" about you (like racial or ethnic origin, political opinions, religious/philosophical beliefs, trade union membership, genetic data, biometric data, health data, data about your sexual life or orientation, and offences or alleged offences) except when we have your specific consent, or when we have to comply with the law.

What about children's data?

MELD is a service intended for adults. We will only collect personal data of children in line with service provision for that person and with appropriate consent.

How and why we use your data

Data protection law means that we can only use your data for certain reasons and where we have a legal basis to do so. Here are the reasons for which we process your data:

Improving MELD

Testing features, interacting with feedback platforms and questionnaires, managing landing pages, mapping our site, traffic optimization and data analysis and research

Legal basis for this data usage: legitimate interests

Client support

Responding to enquiries via video call, phone or email.

Legal basis for this data usage: consent, legitimate interests

Here is what each of these "legal bases" mean:

Consent

You have given clear consent for you to process your personal data for a specific purpose.

You can change your mind!

If you have previously given consent to our processing your data you can freely withdraw such consent at any time. You can do this by emailing us at office@meld-drugs.org.uk

If you do withdraw your consent, and if we do not have another legal basis for processing your information, then we will stop processing your personal data. If we do have another legal basis for processing your information, then we may continue to do so subject to your legal rights. A record of your request to withdraw will be recorded.

Contract

Processing your data is necessary for a service you are obtaining from us, or because we have asked you to take specific steps before joining a service.

Legitimate interests

Processing your data is necessary for our legitimate interests or the legitimate interests of a third party, provided those interests are not outweighed by your rights and interests. These legitimate interests are:

- gaining insights from your behaviour on our website
- delivering, developing and improving the MELD service
- enabling us to enhance, customise or modify our services
- enhancing data security

In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests

Your privacy choices and rights

Your choices

You can choose not to provide us with personal data

If you choose to do this, you can continue to use the website and browse its pages, but we will not be able to engage with enquires without personal data.

You can turn off cookies in your browser by changing its settings

You can block cookies by activating a setting on your browser allowing you to refuse cookies. You can also delete cookies through your browser settings. If you turn off cookies, you can continue to use the website and browse its pages.

You can ask us not to use your data for marketing

We will inform you (before collecting your data) if we intend to use your data for any marketing and if third parties are involved. You can opt out from marketing by emailing us at enquiries@wldas.org.

Your rights

You can exercise your rights by sending us an email at office@meld-drugs.org.uk

You have the right to access information we hold about you

This includes the right to ask us supplementary information about:

- the categories of data we're processing
- the purposes of data processing
- the categories of third parties to whom the data may be disclosed
- how long the data will be stored (or the criteria used to determine that period)
- your other rights regarding our use of your data

We will provide you with the information within one month of your request, unless doing so would adversely affect the rights and freedoms of other (e.g. another person's confidentiality or intellectual property rights). We'll tell you if we can't meet your request for that reason.

You have the right to make us correct any inaccurate personal data about you

You can object to us using your data for profiling you or making automated decisions about you

We may use your data to determine whether we should let you know information that might be relevant to you (for example, notification of new groups that may be relevant). Otherwise, the only circumstances in which we will do this is to provide the MELD service to you.

You have the right to port your data to another service

We will give you a copy of your data so that you can provide it to another service. If you ask us and it is technically possible, we will directly transfer the data to the other service for you. We will not do so to the extent that this involves disclosing data about any other individual.

You have the right to be 'forgotten' by us

You can do this by asking us to erase any personal data we hold about you, if it is no longer necessary for us to hold the data for purposes of your use within MELD services.

You have the right to lodge a complaint regarding our use of your data

Please tell us first, so we have a chance to address your concerns. If we fail in this, you can address any complaint to the UK Information Commissioner's Office, either by calling their [helpline](#) or as directed on their website at www.ico.org.uk.

How secure is the data we collect?

We have physical, electronic, and managerial procedures to safeguard and secure the information we collect. For more information on our efforts to ensure your data is held in a secure manner, please ask for a copy of our Data Security Policy.

And please remember:

- You provide personal data at your own risk: unfortunately, no data transmission is guaranteed to be 100% secure
- If you believe your privacy has been breached, please contact us immediately on office@meld-drugs.org.uk

Where do we store the data?

The personal data we collect is processed at our offices in East Lothian, Midlothian, remotely across Scotland, and in any data processing facilities operated by the third parties identified further below.

By submitting your personal data, you agree to this transfer, storing or processing by us. In the unlikely event we transfer or store your information outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected as outlined in this Privacy Policy.

How long do we store your data?

We will archive and stop actively using any personal identifiable information about you within 12 months from the last time you used MELD services. We will delete your personal data from our archives no later than 6 years from the last time you used MELD or as agreed with you.

Third parties who process your data

Many businesses often use third parties to help them host their servers and applications, power their emails etc. We partner with third parties who we believe are the best in their field at what they do.

When we do this, sometimes it is necessary for us to share your data with them in order to get these services to work well. Your data is shared only when strictly necessary and according to the safeguards and good practices detailed in this Privacy Policy. Where personal data is transferred to a third party in the United States we take steps to ensure that the organisation in question has a current certification with the EU-U.S Privacy Shield Frameworks

Examples of our potential main third-party service providers, some of the data they collect or we share with them, where they store the data and why they need it:

Infrastructure

Service provider	Data collected or shared	Purpose	Place of processing
123.com	Analytics	Website hosting and analytics	Israel (meets EU standards)
RG-CS	Analytics,	Maintenance of IT systems	UK

Analytics

Service provider	Data collected or shared	Purpose	Place of processing
Google Analytics (Privacy policy)	<ul style="list-style-type: none">Contact detailsHow you use meld-drugs.org.ukData that identifies youCookies	GoogleAnalytics is a web analytics service: we use it to track your use of the website	US
Yell	<ul style="list-style-type: none">Contact details	Web analytics service through Yell.com	UK, USA, EEA -

Service provider	Data collected or shared	Purpose	Place of processing
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Analytics Privacy Policy	<ul style="list-style-type: none"> How you use meld-drugs.org.uk Data that identifies you Cookies Marketing Information 	monitoring links to the website	Israel, India
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Comms

Service provider	Data collected or shared	Purpose	Place of processing
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Zoom (Privacy policy)	<ul style="list-style-type: none"> Contact details User ID & Password Cookies 	We use this service for customer communications	US
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Daisy Communications (Privacy policy)	<ul style="list-style-type: none"> Call, text, surfing records App usage Location tracking services 	Management of account Prevention of fraud	
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Cookies

We use cookies. Unless you adjust your browser settings to refuse cookies, we (and these third parties) will issue cookies when you interact with meld-drugs.org.uk. These may be 'session' cookies, meaning they delete themselves when you leave meld-drugs.org.uk, or 'persistent' cookies which do not delete themselves and help us recognise you when you return so we can provide a tailored service.

How can I block cookies?

You can block cookies by activating a setting on your browser allowing you to refuse the setting of cookies. You can also delete cookies through your browser settings. If you use your browser settings to disable, reject, or block cookies (including essential cookies), certain parts of our website will not function fully. In some cases, our website may not be accessible at all. Please note that where third parties use cookies we have no control over how those third parties use those cookies.

Which specific cookies do we use?

Service provider	Key cookies	Purpose
Google, Inc.	NID	Google Analytics uses cookies allows us to see information on the activities of visitors to our website and users of our service, including page views, source and time spent. The information is depersonalized and is displayed as numbers, meaning it cannot be tracked back to individuals. This will help to protect your privacy.
	__ga	
	__gid	
	__gat	
	__gat_gtag_UA_68491880_5	
		To opt out of being tracked by Google Analytics across all websites click here .

Making this policy great

Well done for getting to the bottom of this policy. We have designed it to be as transparent, useful and engaging as possible.

Please don't make this the last time you read it as we will post any changes on this page.