Privacy Policy

Last Reviewed: August 2026

Next Review: August 2027 (or sooner if significant changes in legislation, guidance, or organisational activities occur)

Reviewed by: Laurence Clark

Responsible Officer: Liam Vernon (Data Security and Protection Lead)

Approved by: CEO

Main Contact for Queries: info@pathwaysassociates.co.uk

1. Introduction

Pathways Associates CIC is committed to protecting the privacy, dignity and rights of everyone who interacts with us. This Privacy Policy explains how we collect, use, store and safeguard your personal information when you visit our websites (nwtdt.com and pathwaysassociates.co.uk), work with us, volunteer with us or receive our services. It also explains your rights under UK GDPR and the Data Protection Act 2018. We believe that trust is central to our work. As stated in our original policy, “we are committed to not using your data or sharing it with anyone for any reason” unless the law requires it. By using our websites or providing information to us, you agree to the terms set out in this policy. If you do not agree, you should stop using our websites.

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2. National Data Opt-Out

The national data opt-out allows people to stop health and social care organisations from sharing confidential information for research and planning, except where required by law or in the public interest, such as during the COVID-19 pandemic. Pathways does not share confidential information for research or planning. You may opt out of our mailing lists at any time. Further information is available from NHS England and the Digital Care Hub.

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3. About This Policy

This policy applies to anyone using our websites or interacting with Pathways Associates CIC. It explains what personal information we collect, how we use and protect it, and what rights you have under UK GDPR and the Data Protection Act 2018. If you do not agree with this policy, you should stop using our websites.

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4. Key Definitions

“We”, “us” and “our” refer to Pathways Associates CIC, NWTDT and My Life My Way.

“You” refers to anyone using our websites or services.

GDPR refers to the UK General Data Protection Regulation.

PECR refers to the Privacy and Electronic Communications Regulations.

The ICO is the Information Commissioner’s Office.

Cookies are small files stored on your device to improve website functionality.

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5. How We Process Your Personal Data

We process personal data under the lawful bases set out in UK GDPR. Although not required to register with the ICO as a not-for-profit organisation, we have chosen to register voluntarily.

Consent

We use consent when you join our mailing lists or become a Pathways member. Your email address, and your postal address if you are a member, is stored securely in Mailchimp. We keep this information until you withdraw consent. We do not share it with third parties.

Contract

We use the contract basis for employees, contractors and anyone delivering work for us. Employment and work-related information is stored on encrypted devices with secure backups. We keep this information until the contract ends. We do not share it with third parties.

Legal Obligation

We use this basis for directors and trustees. Information required for statutory registers is stored on encrypted devices. We keep this information until you stop being a director or trustee. We do not share it with third parties unless legally required.

Legitimate Interests

We use legitimate interests when storing contact details is necessary for communication between you and Pathways. The information you provide is stored on encrypted devices and secure cloud storage with two-factor authentication. We keep this information for as long as the legitimate interest applies. We do not share it with third parties.

Criminal Offence Data

We use this basis for DBS checks for staff or volunteers who work with service users. We keep DBS information for thirty-six months. We do not share it with third parties.

If the lawful basis for processing your information changes, we will notify you and stop processing your data if the basis no longer applies.

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6. Your Rights Under UK GDPR

You have the right to be informed, the right of access, the right to rectification, the right to erasure, the right to restrict processing, the right to data portability, the right to object and the right not to be subject to automated decision-making. You may complain to the ICO if you believe your data is being mishandled. Subject Access Requests should be emailed to info@pathwaysassociates.co.uk and we will respond within seventy-two hours.

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7. Cookies

We use cookies to improve your experience on our websites. Cookies help us track how you use the site, remember preferences and keep you logged in. You can manage or delete cookies through your browser settings. Our cookie control system allows you to choose which cookies to accept.

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8. Data Security

We protect personal information using encrypted devices, secure cloud storage, two-factor authentication and GDPR-compliant procedures. Our systems are regularly monitored to ensure ongoing security.

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9. Email Marketing

We use consent and legitimate interests to send newsletters or updates. Our email service provider is Mailchimp. Mailchimp stores your email address, IP address, subscription date and your name. Marketing emails may include tracking information such as opens, clicks and IP addresses to help us understand engagement. You can unsubscribe at any time using the link in any email.

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10. External Privacy Policies

You may also review the privacy policies of Twitter, Facebook, Google, LinkedIn and Mailchimp for further transparency.

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11. Further Information

You can learn more about UK GDPR, the Data Protection Act 2018, PECR and ICO guidance through the Information Commissioner’s Office website.