

## **Illuminate Charity CIO April 2018**

### **Data Protection and Privacy Policy**

1. This privacy policy applies to Illuminate Charity's website and data collection at [www.illuminatecharity.org.uk](http://www.illuminatecharity.org.uk). We at Illuminate Charity take your privacy seriously. This policy covers the collection, processing and other use of personal data under the Data Protection Act 1998 ("DPA") and the General Data Protection Regulations ("GDPR").
2. For the purpose of the DPA and GDPR Data Protection Officers are Maria Varallo and Sam Greenley who are jointly responsible for data protection handling. Any enquiries regarding the collection or processing of your data should be addressed to Sam Greenley or Maria Varallo at [info@illuminatecharity.org.uk](mailto:info@illuminatecharity.org.uk)
3. The eight principles of data protection  
The Data Protection Act states that anyone who processes personal information must comply with eight principles: -
  1. Fairly and lawfully processed
  2. Processed for limited purposes
  3. Adequate, relevant and not excessive
  4. Accurate and up to date
  5. Not kept for longer than is necessary
  6. Processed in line with individuals' rights
  7. Be protected in appropriate ways
  8. Not transferred to other countries without adequate protection

Staff who process personal information must comply with the principles of the Act.

### **Information we collect**

4. We will collect personal data on or via our website only if it is directly provided to us by you the user, e.g. your e-mail address, name, home or work address and telephone number, and therefore has been provided by you with your consent. Normally you will only provide such details if you wish to sign up for our free e-newsletter, or you have applied for a course, workshop or coaching with us.
5. We also use analytical and statistical tools that monitor details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data (but this data will not identify you personally).
6. Your payment information (e.g. credit card details) provided when you make a purchase from our website currently we only offer one workbook for sale, is

*not received or stored by us.* That information is processed securely and privately by the third party payment processors that we use. Illuminate Charity will not have access to that information at any time. We may share your personal data with our payment processors, but only for the purpose of completing the relevant payment transaction. Such payment processors are banned from using your personal data, except to provide these necessary payment services to us, and they are required to maintain the confidentiality of your personal data and payment information.

### **Use of your information**

7. The information that we collect and store relating to you is regarding our course(s) that you have attended, we have your application form and added your name and email to our contacts list. Or you have provided your name and email us and asked us to notify you of our courses and workshops coming up, or provide our services to you, and to meet any contractual commitments to you. In addition, we may use the information for the following purposes:
  - 7.1 To notify you about any changes to our services, future opportunities with us or changes to our charitable structure if relevant.
  - 7.2 If you are an existing client, we may contact you with information about opportunities and services similar to those that were the subject of a previous to you; you can unsubscribe from any mailings by letting us know or you can be removed from our contact list at any point.
  - 7.3 Where you have consented to receive our e-newsletters, from time to time to provide that to you. You can unsubscribe at any point on the newsletter or by contacting Maria or Sam at any point.

### **Disclosure of your information**

8. We may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protection.

### **Controlling the use of your data**

9. If you have given us consent to use your data for a particular purpose you can revoke or vary that consent at any time. If you do not want us to use your data or want to vary the consent that you have provided, you can write to us at the address detailed in clause 2 or email us at [info@illuminatecharity.org.uk](mailto:info@illuminatecharity.org.uk) at any time.

Under GDPR, consent must be:-

- Unbundled - separate from general terms and conditions
- Active opt-in - no pre-ticked boxes or assumption of consent
- Named - clear who is given consent; not just 'third parties'

- Documented - records are kept of the consent given
- Easy to withdraw, pull-out, unsubscribe and be deleted from our records

10. We follow the above and will keep a record

### **Where we store and transfer your data**

11. As part of the services offered to you, for example through our Website, the information you provide to us may be transferred to and stored in countries outside of the European Economic Area (EEA) as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the EEA, or use servers based outside of the EEA - this is generally the nature of data stored in "the Cloud". It may also be processed by staff operating outside the EEA who work for one of our suppliers, e.g. our website server host, or work for us when temporarily outside of the EEA.
12. We will process, disclose or share your personal data only if required to do so by law or in the good faith belief that such action is necessary to comply with legal requirements such as Funders data requests or legal process served on us or the website.
13. You have the right to opt out of our processing your personal data for marketing purposes by contacting us at [info@illuminatecharity.org.uk](mailto:info@illuminatecharity.org.uk)

### **Security**

14. The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you are transmitting it to our site; any such transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

### **Third party links**

15. You might find links to third party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever as we have no control over them.

### **Use of cookies**

16. Our Website uses cookies. We use cookies to gather information and to provide statistical information regarding the use of our Website. Such information will not identify you personally - it is statistical data about our visitors and their use of our Website. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the

hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our Website and the service that we provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our Website.

## **Your rights**

17. The DPA and GDPR give you the right to access information held about you by us. Please write to us or contact us by email if you wish to request confirmation of what personal information we hold relating to you. You can write to us at the address detailed in clause 2, above, or by email to [info@illuminatecharity.org.uk](mailto:info@illuminatecharity.org.uk). There is no charge for requesting that we provide you with details of the personal data that we hold. We will provide this information within one month of your requesting the data.

18. You have the right to change the permissions that you have given us in relation to how we may use your data. You also have the right to request that we cease using your data or that we delete all personal data records that we hold relating to you. You can exercise these rights at any time by writing to us at the address detailed in clause 2, above, or by email to [info@illuminatecharity.org.uk](mailto:info@illuminatecharity.org.uk).

## **Changes to this policy**

19. We may update these policies to reflect changes to the website and customer feedback. Please regularly review these policies to be informed of how we are protecting your personal data.

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact us at [info@illuminatecharity.org.uk](mailto:info@illuminatecharity.org.uk).

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To be reviewed annually