



PRIVACY POLICY

A Touch of Gentleness ("us", "we", or "our") is a Community Interest Company ("CiC") registered in England and Wales (Company number 13649433). Our registered address is at Cherry Croft Farmhouse, Church Road. Herstmonceux, East Sussex, BN27 1QJ.

We are committed to protecting your privacy and ensuring that your personal information is handled with the utmost care and respect. We use the information we collect about you in accordance with current data protection legislation, including the UK Data Protection Act 1998, the UK General Data Protection Regulation ('GDPR') and other relevant legislation and regulations.

PURPOSE

The purpose of this Privacy Policy is to provide transparent and clear information about how we collect, store, use and/or share ("process") your personal data through your use of our services ("services"), including use of our website www.ataouchofgentleness.org ("website") and other interactions you may have with us. We will communicate as clearly and openly as we can about what personal data we gather and how it will be used.

Please read this policy with care, it explains:

- Data we may collect about you
- How we collect it
- How we use that information
- Lawful basis for processing
- Data sharing and disclosure of your details to third parties
- Data security and retention
- Your legal rights
- Contact details and further information

DATA WE COLLECT

We will process the data we receive directly from you, and your Personal Data which we may receive from any other source. The information we collect **may** include:





- **Personal Identification Information:** Your name, email address, home or work address, telephone number(s), and if you are a representative of an organisation, information on your organisation's activities.
- **Technical & Usage Data (Website):** IP address, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our website; Information about how you use our websites, products, and services.
- **Marketing and Communications Data:** Your preferences in receiving marketing and service updates from us and your communication preferences.
- **Information relating to compliments or complaints:** This may include information communicated in emails, surveys or forms, some of which may be anonymised.
- **Financial Data:** Such as data necessary to process donations and payments and payment history. This may include credit/debit card or bank information for transfers and direct debits.

HOW WE COLLECT YOUR DATA

We use different methods to collect data from and about you which **may** include:

- **Direct Interactions:** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email, social media or otherwise. This **may** include us making a note of conversations we have had with you in person, online or over the phone.
- **Automated Technologies or Interactions:** As you interact with our website, we **may** automatically collect Technical Data about your equipment, browsing actions, and patterns. We collect this personal data by using cookies and other similar technologies.
 - **Cookies:** A cookie is a small piece of data that is sent from our web server to your browser. It is stored on your hard drive. A cookie cannot read data off your hard disk or read cookie files created by other websites and will not damage your system. You can reset your browser to refuse cookies or alert you when a cookie is being sent. We do not use cookies to identify you. Find out more: <https://www.aboutcookies.org/>
- **Marketing and Communications Providers:** We seek your separate express consent to send you marketing communications, we make every effort to make the signup forms on our website as clear as possible.
 - We use **Intuit Mailchimp** to send out email newsletters with news related to our events and services to our mailing lists. You may find their privacy notice here: <https://www.intuit.com/privacy/statement/>.





You can find out about how they help us stay GDPR compliant here:

<https://mailchimp.com/gdpr/>

- Mailchimp records both the open rates and clicks by an individual. We may use this information to better tailor our communications. This also allows us to maintain our list and remove users who appear to no longer be interested in the services we provide.
- You can unsubscribe from our marketing communications at any time by following the link in the footer of the last email you received from us or by contacting us directly by email with your request.
- **Third Party Service Providers:** A Touch of Gentleness works with various third-party suppliers and providers to support with the delivery of our activities, including online giving platforms (www.donorbox.org and <https://www.easyfundraising.org.uk/>), and our online shop (<https://jomo-leaf.teemill.com>). We **may** have access to some or all of the data you share with those providers. These Third Party Providers are responsible for their own privacy practices and you should check their websites for their respective privacy statements.
- **Publicly Available Sources:** We may receive personal data about you from public sources such as the websites of organisations we deliver our services to.

HOW WE USE YOUR DATA

We will only use your personal data when the law allows us to and only to the extent that it is needed to fulfil our operational and contractual needs or to comply with legal obligations.

Most commonly, we will use your personal data in the following circumstances:

- In order to carry out and support fundraising activities and events and to facilitate the expansion of A Touch of Gentleness to new areas and groups;
- to fulfil our contractual obligations and responsibilities to you;
- to respond to your requests, queries and problems;
- if we intend to use your personal data for the advertising and marketing of our services. We shall seek your separate express consent and you are entitled to opt out of these services at any time;
- to inform you about any changes to our services and related notices, such as security and fraud notices;





- to administer and protect our business and this website: Including troubleshooting, data analysis, testing, system maintenance, support, reporting, and hosting of data; and
- to manage our internal administration, including complying with our accounting, legal and regulatory obligations as a CIC.

LAWFUL BASES FOR PROCESSING

We rely on the following lawful bases for processing your personal data:

- Consent: Where you have given clear consent for us to process your personal data for a specific purpose.
- Performance of a contract: Where we need to perform the contract we are about to enter into or have entered into with you.
- Legitimate interest: Where it is in our legitimate interests to contact you so that we can pursue and fulfil our charitable aims.
- Legal Obligation: Where we need to comply with a legal obligation.

SHARING YOUR DATA

We will never sell your information.

In the course of us fulfilling our role as a CIC, it will be necessary for us to disclose your Personal Data in certain situations:

- we may need to share your Personal Data with certain bodies to fulfill our contract with you such as suppliers, contractors and sub-contractors, HMRC and other governmental, regulatory bodies.
- we may need to share your Personal Data with regulators and other authorities who may require reporting of processing activities in certain circumstances.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, lawful requests, court orders and legal process.
- to protect our rights, property, or safety and that of our employees, members, or others, in the course of investigating and preventing money laundering and fraud.
- there may also be situations in which it is necessary for us to disclose your Personal Data to other third parties, including but not limited to Professional advisers such as lawyers, accountants, auditors, and insurers.





DATA SECURITY

We ensure that the only people authorised to use your personal data can access it. We maintain technical and physical safeguards that are designed to protect the security and integrity of your Personal Data, and to guard it against accidental or unauthorised access, use, alteration or disclosure to unauthorised third parties. We regularly review our security systems to ensure that your Personal Data remains safe and secure.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Once Personal Details are no longer required, we will take all reasonable steps to destroy and erase it.

Marketing data: We will maintain records of your Personal Data for as long as you remain a registered subscriber to our mailing list. You can update your subscription preferences or unsubscribe from our marketing communications at any time by following the link in the footer of the last email you received from us or by contacting us directly by email with your request. If you have not opened any marketing email communication from us or interacted in any other way with us for 36 months (3 years) we will regard you as an inactive subscriber and delete your details from our mailing lists except where retention for the purposes of satisfying any legal, accounting, or reporting requirements is necessary.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights include:

- Your right of access – You have the right to ask us for copies of your personal data.
- Your right to rectification – You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure – You have the right to ask us to erase your personal data in certain circumstances.





- Your right to restriction of processing – You have the right to ask us to restrict the processing of your personal data in certain circumstances.
- Your right to object to processing – You have the right to object to the processing of your personal data in certain circumstances.
- Your right to data portability – You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.
- Your right to withdraw consent – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details below.

CHANGES TO OUR PRIVACY POLICY

We will update this Privacy Notice from time to time to reflect changes in our business. All such changes will be posted to the Site and if we consider it to be appropriate, we will notify subscribers of any material changes by e-mail.

HOW TO CONTACT US

If you have any questions about this privacy notice or our privacy practices, please contact us by email at: info@atouchofgentleness.org

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO).

HOW TO COMPLAIN

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details above.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane



A Touch of Gentleness CIC
Company number: 13649433

Cherry Croft Farmhouse, Church Road, Herstmonceux. BN27 1QJ



Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>



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