

DRAFT CEF BRITAIN PRIVACY NOTICE

Usage

The layout and content may be changed according to the needs of the organisation. A model example follows. It is highly recommended that the presentation of this document on a website be via collapsible topics. (see figure 1, below).

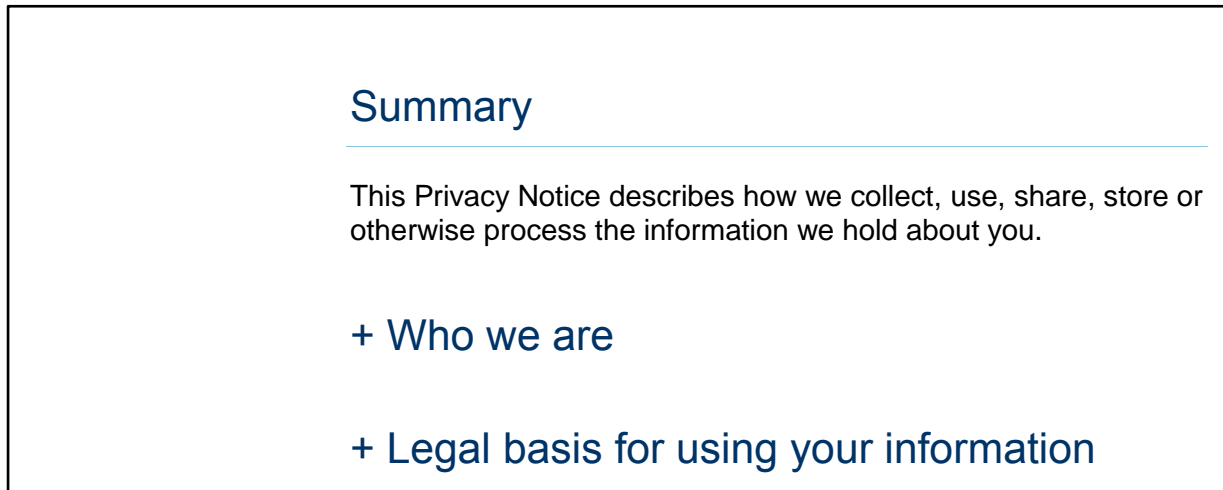


Figure 1



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Privacy Notice

Who we are

We are CEF Britain, referred to below as “CEF”, “we”, “our”, “us”), and we take your privacy seriously. This Privacy Notice covers all activities of our organisation.

CEF Britain (charity reg. 235080), and CEF Britain Limited (company reg. 570740), are registered in England and Wales, and maintain our registered office at 25 Felton Road, Lower Parkstone, Poole, BH14 0QR, United Kingdom. Our correspondence address is PO Box 9281, Poole, BH14 4FS, United Kingdom.

Summary

This Privacy Notice describes how we collect, use, share, store or otherwise process the information we hold about you.

If you are aged 16 years or under, please seek advice from your parent or guardian before sending any information about yourself.

Legal basis for using your information

All organisations need a legal reason to use your personal information, if they don't have one, they can't use it. There are a number of legal grounds that enable data processing. It's quite complicated but below are the most relevant grounds you should be aware of:

[With your consent \(C\)](#)

There are some activities where we process personal information with your consent, which you are able to withdraw at any time. For example, where we want to send you newsletters and similar messages by email, we would ask your permission first and you could opt-out at any time. We will indicate in the Notice where we rely on consent.

[To fulfil a contract \(A\)](#)

We also process your personal information in order to fulfil a contract we have with you. For example, when you gain employment or purchase a service from us, we will process your information to administer that transaction.

[For a legitimate interest \(LI\)](#)

Sometimes we may use your information to help us provide services, but only where that activity doesn't negatively affect your rights. For example, we might use your information to communicate with you on the basis of our legitimate interest.

[To comply with legal obligations \(LO\)](#)

There may be situations where we need to use your information to comply with legal obligations. For example, we are required by law to keep certain records visitors in case there is an emergency, so we can make sure you're safe.

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What information do we collect?

When you interact with our organisation, products, and services, we may collect your personal data – that’s information about you and our interaction. Generally, this may include:

- Your contact details, such as your full name, organisation, address, telephone number, email address.
- When you participate in a survey, we might request your contact details and demographics.
- Your marketing preferences, such as for newsletters, and your particular areas of interest.
- When participating in our activities, such as our Good News clubs, we will collect information about the child or young person, as well as related emergency contact information and – potentially – sensitive personal data such as health details.

Where you provide information to us about other people, you need to make sure you have their permission to do so.

When and how we collect your information

We may collect information you provide to us directly and indirectly when interacting with our website or staff. This may include such interactions as when you:

- Make an initial approach to us in person, by email or on the phone;
- Visit our website, or fill out our online forms;
- Interact with us in online forums, by email, text, or on social media;
- Complete our marketing surveys;

Our processors

There may be situations where we use data processors – companies who act on our behalf – to collect your information for us. These processors can only use your information in accordance with our instructions and for the purposes stated in this Notice published on our websites and partner websites.

Our partners and Third Parties

We collect information about you when it is provided to us by third parties. This might include when you interact with our affiliated organisations such as schools and churches. You should always read the privacy policies of other third parties you use, as they will use your information in accordance with their own privacy policies.

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How we use your personal information

The reason we use your information will often be obvious from the way you interact with us. We have detailed below, the legal bases for processing your personal data. Where there is more than one, the exact grounds will depend on the activity. See the section above for an explanation of each.

Use of personal information	Basis
(a) To provide you with the products and services you have requested, including responding to any enquiries, complaints or requests you may have, (b) to manage our relationship with you, such as for support, or to tailor our service to your preferences, where you tell us about them.	C, LI, A
Make decisions about what direct marketing to show you based on how you have interacted with us	LI
(a) Comply with legal obligations on us, and (b) to keep you safe and ensure your security	LO, LI
(a) To send you product or service related communications, service messages, (b) Facilitate the restructuring or sale of all or part of our business	LO, LI,C,A
Send you direct marketing, where you have consented	C, LI

Further Information on how we use your information

We sometimes use your information for other reasons, so to help we have added more information to these below.

[Direct marketing](#)

In addition to sending you information about the products and services you use, and where we have your permission, we may send you direct marketing communications about services, events and similar matters, but only when we have your consent. These marketing communications may be sent by post, email, telephone, or social media.

We may send you marketing communications while you have an ongoing relationship with us and for a reasonable time after. Please note that such marketing communications sent by email may record your interaction with the communication, such as recording that your opened, forwarded or deleted the email.

You will be able to opt-out of direct marketing by following the instructions in the communications you receive, or by writing to us using the contact details below.

[Linked services, third party sites and content](#)

Our website may, from time to time, contain links to other websites which are outside of our control and are not covered by this Notice. We do not accept any responsibility or liability for other sites' privacy notices or privacy policies. If you access other websites using the links provided, please check their policies before submitting any personal information.

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Payments and credit checks

Your information may be used to take payment for products and services and may be used to verify credit details.

Disclosures required by law

Your information will be disclosed where we are obliged by law to do so. We may also disclose your information where we are allowed by law to protect or enforce our rights or the rights of others and for the detection and prevention of crimes, such as fraud.

Data Transfers within the EEA

When you complete our registration forms or use our services, we may transfer your information to our processors - companies that carry out activities on our behalf, and only on our instructions.

International Data Transfers

We do not transfer your personal data outside of the European Economic Area (EEA).

How we share your personal information

Where you provide your information to us we do not share it with any third parties except in the performance of a contract or in anticipation of a contract. Your information will only be shared and used in accordance with this notice, and where an agreement is in place to ensure that your information is protected. We won't sell your personal information without your consent.

Sharing with our processors

There may be situations where we use data processors – companies who act on our behalf – to process your information for us. These processors can only use your information in accordance with our instructions and for the purposes in this Policy.

Sale of our business

If we restructure or sell all or part of our operations, we may transfer your information as part of that activity. Where this is the case your information will be used in accordance with this Notice unless you are notified otherwise.

Requesting copies of your information

You may request a copy of your personal information which we may hold about you. You may also ask us to correct any inaccuracies in your personal information. This right may be restricted by law where disclosing information may result in the personal information of other individuals being disclosed and it would be unreasonable to do so.

Withdrawing consent

Where we may rely on consent to use your information, you have the right to withdraw that consent for that processing activity at any time. However, we may have the right to rely on an alternative legal basis for the processing activity and will inform you of that.

If you do withdraw consent we may not be able to provide you with the product or service you have requested.

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Other rights

You may have the right to object, erase, or restrict our processing of your information - for example, where we process your personal information because this is in our legitimate interests, you may object to this. We will carefully consider your request as there may be circumstances which require us to, or allow us to, continue processing your data.

Retention of your information

We shall retain your information in accordance with our records retention policy, or for as long as necessary for the uses set out in this notice or while there is a legitimate business reason for doing so.

If you ask us to delete your information before this time, we may not be able to do so for technical, legal, regulatory or contractual constraints. For example, where you wish to be suppressed from direct marketing, we would need to retain your information for this purpose.

Where you ask for your account to be closed, we will do this as soon as possible subject to any terms and conditions relating to the account. Your information will be retained in order to comply with legal and regulatory obligations as well as for analysis, to prevent fraud, collect any monies owed, and to resolve disputes.

Cookies

We also receive information about you indirectly when you interact with us. For example, when you visit our websites: the devices you use may provide us with your general location (like which country or region you're in), if you are using ad-blockers, and your IP address. We may also receive information from cookies and other technologies that are on your device or browser.

A cookie is a piece of data stored on the user's hard drives containing information about the user. Cookies allow us to keep track of your user name and password so you don't have to re-enter that information each time you visit one of our sites. Most browsers contain information on how to set your browser to notify you before accepting cookies or to disable cookies entirely. However, if you don't accept cookies, you may not be able to take advantage of various features on our sites that are available to other visitors.

Complaints, Questions and Assistance

If you have any comments, concerns or complaints about our uses of your information we would ask that you contact us first, so that we can try and resolve any matter.

However, where we are unable to help, you are able to complain to the Information Commissioner's Office in the United Kingdom or the data protection regulator in your country of residence, who will be able to liaise with the UK Information Commissioner in the UK.

You are encouraged to raise any issues with our Compliance Officer:

by Email: [\[INSERT – this should be compliance@cefbritain.org\]](mailto:[INSERT – this should be compliance@cefbritain.org])

by telephone: +44(0)[INSERT]

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by post:

The Compliance Officer, PO Box 9281, Poole, BH14 4FS, United Kingdom

Alternatively, you may raise your queries or concerns with the Supervisory Authority. In the United Kingdom, this is the Information Commissioner's Office:

by Email: casework@ico.org.uk

by telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)

by post:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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Document Owner and Approval

Janet Burns is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above.

A current version of this document is available to all authorised members of staff upon request to the Compliance Officer.

This policy is hereby approved by Walmsley Estate Agents and is issued on a version controlled basis effective from the date of the authorised signature below.

Signature:

Date:

Change History Record

Issue	Description of Change	Approval	Date
1.1	Initial issue	Janet Burns	16/05/2018