

## PRIVACY POLICY

### 1. INTRODUCTION

- 1.1 We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are, the types of data we collect about you, how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.
- 1.2 We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).
- 1.3 Unless otherwise stated, defined terms in this Policy shall have the same meaning set out in the Articles of Association accessible on our website.
- 1.4 This policy applies to any personal data we collect about you when you:
  - 1.4.1 use any of our websites;
  - 1.4.2 use any of our apps;
  - 1.4.3 contact us or when we contact you;
  - 1.4.4 apply for one of our vacancies;
  - 1.4.5 purchase goods or services from us;
  - 1.4.6 provide services or goods to us (where, for example, you are a sole trader, partnership or where you are providing services or goods on behalf of your employer/contractor); and/or
  - 1.4.7 visit our sites.
- 1.5 Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### 2. KEY TERMS

- 2.1 It would be helpful to start by explaining some key terms used in this policy.

"We", "us", "our", "the Organisation"  
Data Protection Officer

means Improving Futures CIC  
means our Chief Executive Officer as appointed  
from time to time

Email: [enquiries@improvingfutures.org.uk](mailto:enquiries@improvingfutures.org.uk)

Personal data

Telephone: 07903540098

any information relating to an identified or  
identifiable individual

Special category  
personal data

Personal data revealing racial or ethnic origin,  
political opinions, religious beliefs, philosophical  
beliefs or trade union membership

Genetic and biometric data (when processed to  
uniquely identify and individual)

Data concerning health, sex life or sexual orientation  
The individual who the personal data relates to

Data subject

### 3. **PERSONAL DATA WE COLLECT ABOUT YOU**

3.1 We may collect and use the following personal data about you:

- 3.1.1 your name and contact information, including email address and telephone number and company details;
- 3.1.2 information to enable us to check and verify your identity (e.g. your date of birth);
- 3.1.3 your gender, if you choose to give this to us;
- 3.1.4 location data (if you choose to give this to us);
- 3.1.5 your billing information, transaction and payment card information;
- 3.1.6 your personal or professional interests;
- 3.1.7 your professional online presence (e.g. LinkedIn profile);
- 3.1.8 your contact history, purchase history and saved items.;
- 3.1.9 information from accounts you link to us (e.g. Facebook);
- 3.1.10 information about how you use our website, IT, communication and other systems;
- 3.1.11 your responses to surveys, competitions and promotions.

3.2 We collect and use this personal data to provide products and/or services to you. If you do not provide personal data we ask for, it may delay or prevent us from providing any of our products and/or services to you.

### 4. **HOW YOUR PERSONAL DATA IS COLLECTED**

4.1 We collect most of this personal data directly from you in person, by telephone, text or email and/or via our website. However, we may also collect information:

- 4.1.1 from publicly accessible sources (e.g. Companies House or HM Land Registry);
- 4.1.2 directly from a third party;
- 4.1.3 from a third party with your consent;
- 4.1.4 via our website.

### 5. **HOW AND WHY WE USE YOUR PERSONAL DATA**

5.1 Under data protection law, we can only use your personal data if we have a proper reason for doing so, such as:

- 5.1.1 to comply with our legal and regulatory obligations;
- 5.1.2 for the performance of our contract with you or to take steps at your request before entering into a contract;
- 5.1.3 for our legitimate interests or those of a third party; or
- 5.1.4 where you have given consent.

5.2 A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our rights against your own.

5.3 The table below explains what we use (process) your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
To provide products and/or services to you	To perform our contract with you or to take steps at your request before entering into a contract
To prevent and detect fraud against you or us	For our legitimate interests or those of a third party, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our staff, volunteers members, partners & suppliers and verify their identity	To comply with our legal and regulatory obligations
Screening for financial and other sanctions or embargoes	
Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under health and safety law or rules issued by our professional regulator	
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	
Ensuring business policies are adhered to, e.g. policies covering security and internet use	For our legitimate interests or those of a third party, i.e. to make sure we are following our own internal procedures, so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, i.e. to protect trade secrets and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our business and/or interpret our research results, e.g. in relation to our financial performance, customer base, product range or other efficiency measures	For our legitimate interests or those of a third party, i.e. to be as efficient as we can so we can deliver the best service for you at the best price

Research and insight projects and inviting you to take part in these	For our legitimate interests or those of a third party, i.e. to help us better understand your requirements so that we can offer and provide relevant products and/or services to you
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, i.e. to prevent and detect criminal activity that could be damaging for you and/or us  To comply with our legal and regulatory obligations
Updating and enhancing all records	To perform our contract with you or to take steps at your request before entering into a contract  To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, e.g. making sure that we can keep in touch with our customers about existing orders and new products
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations  For our legitimate interests or those of a third party, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services to: volunteers, members, partners & suppliers	For our legitimate interests or those of a third party, i.e. to promote our business to existing and former volunteers members, partners & suppliers
Credit reference checks via external credit reference agencies	For our legitimate interests or those of a third party, i.e. to ensure our volunteers members, partners & suppliers are likely to be able to pay for our products and services
External audits and quality checks, e.g. for ISO or Investors in People accreditation and the audit of our accounts	For our legitimate interests or those of a third party i.e. to maintain our accreditations so we can demonstrate we operate at the highest standards  To comply with our legal and regulatory obligations

5.4 Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

5.4.1 we have your explicit consent;

5.4.2 the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or

5.4.3 the processing is necessary to establish, exercise or defend legal claims.

## 6. **PROMOTIONAL COMMUNICATIONS**

6.1 We may use your personal data to send you updates (by email, text message, telephone or post) about our products and/or services, including exclusive offers, promotions or new products and/or services.

6.2 We have a legitimate interest in using your personal data for promotional purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

6.3 We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes without your explicit approval.

6.4 You have the right to opt out of receiving promotional communications at any time by:

6.4.1 contacting us at [enquiries@improvingfutures.org.uk](mailto:enquiries@improvingfutures.org.uk) and entering "Stop" in the subject box;

6.4.2 using the 'unsubscribe' link in emails or 'STOP' number in texts;

6.5 We may ask you to confirm or update your marketing preferences if you ask us to provide further products and/or services in the future, or if there are changes in the law, regulation, or the structure of our business.

## 7. **WHO WE SHARE YOUR PERSONAL DATA WITH**

7.1 We routinely share personal data with:

7.1.1 third parties we use to help deliver our products and/or services to you (e.g. payment service providers, warehouses and delivery companies);

7.1.2 other third parties we use to help us run our business (e.g. marketing agencies or website hosts);

7.1.3 third parties approved by you (e.g. social media sites you choose to link your account to or third-party payment providers);

7.1.4 third party research agencies;

7.1.5 our insurers and brokers; and

7.1.6 our banks.

7.2 We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers to ensure they can only use your personal data to provide services to us and to you.

7.3 We may also need to:

7.3.1 share personal data with external auditors, e.g. in relation to relevant accreditations and the audit of our accounts or reviews by our external stakeholders.

7.3.2 disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

7.3.3 share some personal data with other parties, such as potential buyers of some or all our business or during a re-structuring. Usually, information will be anonymised, but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

7.4 If you would like more information about who we share our data with and why, please contact us (see '**How to contact us**' below).

## 8. **WHERE YOUR PERSONAL DATA IS HELD**

8.1 Personal data may be held at our offices, third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

8.2 All third parties will be based in the UK and/or the European Economic Area.

## 9. **HOW LONG YOUR PERSONAL DATA WILL BE KEPT**

9.1 We will keep your personal data while you have an account with us or we are providing products and/or services to you. Thereafter, we will keep your personal data for as long as is necessary:

9.1.1 to respond to any questions, complaints or claims made by you or on your behalf;

9.1.2 to show that we treated you fairly; and

9.1.3 to keep records required by law or by our external stakeholders for reporting purposes.

9.2 We will not keep your personal data for longer than necessary. Different retention periods apply for different types of personal data.

9.3 When it is no longer necessary to keep your personal data, we will delete or anonymise it.

## 10. YOUR RIGHTS

10.1 You have the following rights, which you can exercise free of charge:

<b>Access</b>	The right to be provided with a copy of your personal data
<b>Rectification</b>	The right to require us to correct any mistakes in your personal data
<b>Erasure (also known as the right to be forgotten)</b>	The right to require us to delete your personal data in certain situations
<b>Restriction of processing</b>	The right to require us to restrict processing of your personal data in certain circumstances, e.g. if you contest the accuracy of the data
<b>Data portability</b>	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party in certain situations
<b>To object</b>	The right to object: <ul style="list-style-type: none"> <li>• at any time to your personal data being processed for direct marketing (including profiling);</li> <li>• in certain other situations to our continued processing of your personal data, e.g. processing carried out for the purpose of our legitimate interests.</li> </ul>
<b>Not to be subject to automated individual decision-making</b>	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

10.2 For further information on each of those rights, including the circumstances in which they apply, please contact [enquires@improvingfutures.org.uk](mailto:enquires@improvingfutures.org.uk) or see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights.

10.3 If you would like to exercise any of those rights, please:

10.3.1 email, call or write to our Data Protection Officer (see below: 'How to contact us');

10.3.2 provide enough information to identify yourself (e.g. your full name, address, unique reference number or matter reference number) and any additional identity information we may reasonably request from you; and

10.3.3 let us know what right you want to exercise and the information to which your request relates.

## 11. KEEPING YOUR PERSONAL DATA SECURE

11.1 We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

11.2 We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

11.3 If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## 12. HOW TO COMPLAIN

- 12.1 We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your information.
- 12.2 You also have the right to lodge a complaint with the Information Commissioner or any relevant European data protection supervisory authority. The Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or telephone: 0303 123 1113.

## 13. CHANGES TO THIS PRIVACY POLICY

- 13.1 This privacy notice was published on 20<sup>th</sup> August 2023 and last updated on the date set out in the footer (and any such updates shall be deemed to take effect from that date).
- 13.2 We may change this privacy notice from time to time—when we do, we will inform you via our website or email.

## 14. HOW TO CONTACT US

- 14.1 Please contact our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.
- 14.2 Our contact details are shown below:

Improving Futures Data Protection Officer	
<b>Address</b>	Improving Futures 3 The Crescent Alvaston Derby DE24 0AD
<b>Email</b>	enquires@improvingfutures.org.uk
<b>Telephone</b>	+44 7903540098