



PRIVACY POLICY

This Privacy Policy applies to information Starlings Support CIC collects about individuals who interact with our organisation. It explains what personal information we collect and how we use it. If you have any comments or questions about this notice, feel free to contact us at info@starlingssupport.org

1. PERSONAL DATA THAT WE PROCESS

The table below explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed:

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Running projects, services and activities	Name, contact details, personal information essential to the delivery of the service	Legitimate interests – it is necessary for us to hold some personal details so we can provide the service to you (for example, if we are holding an event, we need to notify you of the venue, or meet your access or dietary requirements)
Purchasing services	Name, contact details, payment information	Contract – we need to collect this information in order to complete the purchase and for legal and accounting purposes
Selling services	Name, contact details, payment information	Contract – we need to collect this information in order to deliver our

		service to you and for legal and accounting purposes
Sending marketing information	Name, contact details (eg email address)	Consent – we will only communicate marketing information to you if we have your explicit consent
Website functionality	Website activity collected through cookies	Legitimate interests - it may be necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your order before you have fully completed the process.

2. HOW WE USE YOUR DATA

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- communicate with you to provide a service to you that you have requested;
- handle payments or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

3. WHEN WE SHARE YOUR DATA

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data. In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. HOW LONG WE KEEP YOUR DATA

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required. Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

5. RIGHTS YOU HAVE OVER YOUR DATA

You have a range of rights over your data, which include the following:

- Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this (for example by putting 'unsubscribe' links at the bottom of all our marketing emails).
- You have the right to ask for rectification and/or deletion of your information.
- You have the right of access to your information.
- You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please contact us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

6. COOKIES AND USAGE TRACKING

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things – for example, remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not

personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>

7. MODIFICATIONS

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

Date Drafted:	24 th January 2019
Date Adopted by Directors:	5 th February 2019
Date Effective:	5 th February 2019
Latest Review Date	26 th February 2021
Date Revisions Adopted by Directors	N/A
Next Review Date:	March 2022 or upon changes in legislation, whichever is sooner