

Online Privacy Notice

This document outlines how The Brightwell Centre collects data and how we use it.

1. Personal data that we process

The following table explains the types of data we collect and the legitimate basis in 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.
Subscribing to email updates about our work	Name, email	Consent - you have given your active consent.
Making a donation	Name, email, address, payment information	Legitimate interests - this information is necessary for us to fulfill your intention of donating money and your expectation of receiving a confirmation message.
Signing up as a member	Name, email	Contract - by paying your membership fees you have entered into a contractual relationship with us as set out in our membership terms and conditions.
Website functionality	Website activity collected through cookies	Legitimate interests it is 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'll 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 above.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations 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'll only pass your data to third parties in the following circumstances:

- when you have provided your explicit consent for us to pass data to a named third party;
- when 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
- when we are required by law to share your data.

In addition, we'll 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 (2018).

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

Under the Data Protection Act 2018, all individuals ('data subjects') have the right to find out what information the Centre holds on them and how this data is used. These rights include the following:

- 'Right to withdraw' – where data processing is based on consent, you have the right to withdraw 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).
- 'Right to rectification' – if you believe that any of the information the Centre holds about you is out of date or incorrect you have the right to ask us to amend this.
- 'Right to be forgotten' – should you choose to withdraw your enquiry to the Centre, you have the right to request we erase all your details from our files (electronic and hard copy) within 30 calendar days.

- 'Right to access' – you have the right to request access to the data the Centre holds about you, by writing to us at The Brightwell Centre, Bradbury House, Wheatfield Drive, Bradley Stoke, Bristol BS32 9DB. This is known as a Subject Access Request (SAR). We'll respond to a SAR within 30 calendar days from the request, although this may be extended by two months if the request is complex.
- 'Right to portability' – your data will not be shared with any third parties unless you request that we do so, or you provide us with your consent.
- You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you feel your data 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/>.

Please note that in exercising some of these rights, such as the 'right to withdraw your consent' to the processing of your data, it may make it impossible for us to continue to deliver some services to you. However, where possible, we will always try to allow the maximum application of your rights while continuing to deliver as many services to you as possible.

6. Cookies & 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, such as 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 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. Amendments

We will review and modify this Online Privacy Notice from time to time and will publish the most current version on our website.