

Kindled Spirit – Data Privacy Policy



We respect your privacy and are committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. WHO WE ARE AND HOW TO CONTACT US

Kindled Spirit (charity registration no 1149146) is the controller and responsible for your personal data (referred to as “we” “us” or “our” in this privacy policy).

If you have any questions about this privacy policy or any concerns or complaints about how your data has been processed, please contact us at info@kindledspirit.org.uk

2. PURPOSE OF THIS PRIVACY POLICY

This privacy policy aims to give you information on how we collect and process your personal data through:

Your use of this website (including, but not limited to, any data you may provide through this website by, for example, signing up as an Ambassador for Kindled Spirit or attend one of our fundraising events, where your data maybe collected with your knowledge.

By collecting such data, we will be able to inform you about relevant developments at Kindled Spirit. This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy, together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you. We want you to be fully aware of how and why we are using your data.

This privacy policy supplements other notices and privacy policies (such as wording that may feature on our website alongside options to subscribe to newsletters and other communications) and is not intended to override them.

3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information from which your individual identity could be discerned. It does not include data where the identity has been removed (anonymous data). We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- identity data, including first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and/or gender;
- contact data, including address, email address and/or telephone number(s);
- financial data, including bank account and payment card details;
- transaction data, including details about payments to and from you and other details of products and services you have purchased from us;
- technical data, including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website and platforms hosting our content;
- profile data, including your username, your interests, preferences, feedback and/or survey responses;
- usage data, including information about how you use our website; and/or
- marketing and communications data, including your preferences in receiving content and/or marketing from us and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

4. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you.

Provided by you – directly. You may give us your name and contact details by filling in forms or by corresponding with us by post, phone, email or otherwise. This also includes personal data you provide when you register as a supporter of the Campaign, subscribe to any mailing lists, give feedback and/or contact us directly via such forms, email, telephone or similar mediums.

5. HOW WE USE YOUR PERSONAL DATA

The uses:

We will only use your personal data when the law allows us to. We will use your personal data in the following circumstances:

Register you as an Ambassador of Kindled Spirit;
Inform and engage you about the work of Kindled Spirit;
Manage donations, payments, fees and/or charges;
Comply with our legal obligations;
Answer your queries and respond to your questions and/or complaints.

The legal bases;

Where you have specifically consented to a particular use of your data (such as where you have subscribed to receive information about Kindled Spirit;
Where you have entered into a legal agreement with us that necessitates that particular use of your data (such as where you make a donation to us);
Where it is a necessary lawful basis for our legitimate interests and your interests and fundamental rights do not override those interests; or
Where we are obliged to process your data in a particular way by law (for example, if we are required to notify any authority or regulator of the nature or value of your donations).

6. WHEN WE WILL SHARE YOUR DATA

We will never sell your personal data to any other organisation and we will not share your personal data.

7. WHEN YOUR DATA MAY BE USED FOR MARKETING

Our Marketing & Newsletters. You will receive marketing communications (i.e. communications promoting Kindled Spirit from us if you have requested information from us and/or you have agreed to receiving that marketing.

Right to object/Opting-out

You can ask us to stop sending you marketing messages at any time by contacting us at info@kindledspirit.org.uk

You have a right to opt-out of your data being used for direct marketing.

If we process your data on the basis of "legitimate interests" or "a task carried out in the public interest", then you have the right to object to us using your data in that way. This right is not absolute and we may continue to process your data if we can demonstrate compelling legitimate grounds for the processing.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of other engagement or transactions with us (so, for example, if you opt-out of receiving messages from us – this will not cause us to change the way we use data you have provided for processing donation payments).

8. COOKIES

A cookie is a tiny text file that is stored on users' machines (computers, tablets or mobile devices). We may use cookies in order to tailor your experience on our site according to the preferences you have specified. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

9. CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purposes (as set out in this privacy policy). If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

10. CHANGES TO THE PRIVACY POLICY

We keep our privacy policy under regular review and will notify you of any substantive changes. Any revisions to our privacy policy can be reviewed on this website.

11. THIRD-PARTY LINKS

This website may include links to third-party websites, platforms, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites or platforms and are not responsible for their privacy policies or statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

12. INTERNATIONAL TRANSFERS

In order to process your personal data for the purposes outlined in this Privacy Policy, we may need to transfer your data to countries or jurisdictions outside the European Economic Area (EEA). In each case, we ensure that our suppliers provide adequate protection for the rights of data individuals in connection with the transfer of their personal data. Currently, we expect all suppliers to use a standard contractual clause approved by the European Union or be part of the Privacy Shield scheme in the United States.

13. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We will notify you and any applicable regulator of a breach where we are legally required to do so.

14. HOW LONG WE WILL HOLD YOUR PERSONAL DATA FOR

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

15. YOUR LEGAL RIGHTS

As a data subject, you have a number of rights in relation to your personal data. Below, we have described the various rights that you have, as well as how you can exercise them.

Right of access

You may, at any time, request access to the personal data that we hold which relates to you (you may have heard of this right being described as a "subject access request").

We follow the ICO's "Subject Access Code of Practice" when dealing with requests for access to personal data. You can read this code by visiting <https://ico.org.uk/media/for-organisations/documents/2014223/subject-access-code-of-practice.pdf>.

Please note that this right entitles you to receive a copy of the personal data that we hold about you in order to enable you to check that it is correct and to ensure that we are processing that personal data lawfully. It is not a right that allows you to request personal data about other people, or a right to request specific documents from us that do not relate to or contain your personal data.

For the avoidance of doubt we only hold contact data about you e.g. Name, Email Address and in some cases Home Address, where collected by one of our donation platforms.

You can exercise this right at any time by contacting us at contact@hajirapiranie.co.uk and telling us that you are making a subject access request. You do not have to fill in a specific form to make this kind of request.

Your right to rectification and erasure

You may, at any time, request that we correct personal data that we hold about you which you believe is incorrect or inaccurate. You may also ask us to erase personal data if you do not believe that we need to continue retaining it (you may have heard of this right described as the "right to be forgotten").

Please note that we may ask you to verify any new data that you provide to us and may take our own steps to check that the new data you have supplied us with is right. Further, we are not always obliged to erase personal data when asked to do so; if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to erase, we will tell you what that reason is at the time we respond to your request.

You can exercise this right at any time by contacting us at info@kindledspirit.org.uk and telling us that you are making a request to have your personal data rectified or erased and on what basis you are making that request. If you want us to replace inaccurate data with new data, you should tell us what that new data is. You do not have to fill in a specific form to make this kind of request.

Your right to restrict processing

Where we process your personal data on the basis of a legitimate interest (see the sections of this privacy policy which explain how and why we use your information), you are entitled to ask us to stop processing it in that way if you feel that our continuing to do so impacts on your fundamental rights and freedoms or if you feel that those legitimate interests are not valid.

You may also ask us to stop processing your personal data: (a) if you dispute the accuracy of that personal data and want us to verify that data's accuracy; (b) where it has been established that our use of the data is unlawful but you do not want us to erase it; or (c) where we no longer need to process your personal data (and would otherwise dispose of it) but you wish for us to continue storing it in order to enable you to establish, exercise or defend legal claims.

Please note that if for any reason we believe that we have a good legal reason to continue processing personal data that you ask us to stop processing, we will tell you what that reason is, either at the time we first respond to your request or after we have had the opportunity to consider and investigate it. You can exercise this right at any time by contacting us at info@kindledspirit.org.uk and telling us that you are making a request to have us stop processing the relevant aspect of your personal data and describing which of the above conditions you believe is relevant to that request. You do not have to fill in a specific form to make this kind of request

Your right to stop receiving communications

As noted above, where we send you email marketing communications (or other regulated electronic messages) you have the right to opt-out at any time. You can do this by using the 'unsubscribe' link that appears in the footer of each communication (or the equivalent mechanism in those communications).

Alternatively, if for any reason you cannot use those links, or if you would prefer to contact us directly – you can unsubscribe by contacting us at info@kindledspirit.org.uk and telling us which communications you would like us to stop sending you.

Exercising your rights

When you write to us making a request to exercise your rights, we are entitled to ask you to prove that you are who you say you are. We may ask you to provide copies of relevant ID documents to help us to verify your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. It will help us to process your request if you clearly state which right you wish to exercise and, where relevant, why it is that you are exercising it. The clearer and more specific you can be, the faster and more efficiently we can deal with your request. If you do not provide us with sufficient information, then we may delay actioning your request until you have provided us with additional information (and where this is the case, we will tell you).

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one (1) month. However, it could take us longer than a month if your request is particularly complex or if you have made a number of requests. In this case, we will notify you of this and keep you updated.

16. RIGHT TO LODGE A COMPLAINT

If you are unhappy with the way that we have processed or handled your data then you have a right to complain to the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom.

The contact details for the ICO are:

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

Telephone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

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