

## Privacy Notice

### Introduction:

This privacy policy sets out how Launchpad/WSE uses and protects any information that you give us when you use this website.

Launchpad/WSE is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

This privacy notice provides you with details of how we collect and process your personal data through your use of our site <https://launchpads.org.uk> including any information you may provide.

By providing us with your data, you warrant to us that you are over 13 years of age.

WSE is the data controller and are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

We have appointed a nominated person who is responsible for privacy related matters. The (Data Protection Officer) DPO is responsible for overseeing this Privacy Standard and, as applicable, developing Privacy Guidelines. That post is held by The Revd Canon Nick Ralph, Director of Social Enterprise, and Engagement, If you have any questions about this privacy notice, please contact him using the details set out below.

### Contact Details

Our full details are: [nick.ralph@w-se.org.uk](mailto:nick.ralph@w-se.org.uk)  
The Revd Canon Nick Ralph  
Diocesan Office,  
Old Alresford Place,  
Old Alresford,  
Hants,  
SO24 9DH

If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us using the above information.

## 1. What data we collect:

Personal data means any information capable of identifying an individual.

We may process certain types of personal data about you which includes:

- **Identity Data:** This may include your first name, maiden name, last name, username, marital status, title, date of birth and gender. It may also include data such as passport, utility bills and other identifying data when requesting access to records.
- **Financial Data:** This may include information about your current financial position with regards to payment of fees, eligibility to claim grants, paying wages.
- **Contact Data:** This may include your billing address, delivery address, email address and telephone numbers.
- **Medical Data:** This may include GP details, any medical conditions.

### Sensitive Data:

We may collect sensitive data about you. Sensitive data refers to data that includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, information about your health. We may also collect information about criminal convictions and offences.

- DBS update checks

We may need to collect the following sensitive data about you to enable us to provide any kind of support we offer.

- Medical Data

We require your explicit consent for processing sensitive data, so when you submit your details, we will ask you to confirm your consent to this processing.

Where we are required to collect personal data by law, or under the terms of the agreement between us and you do not provide us with that data when requested, we may not be able to perform the agreement (for example, to deliver goods or services to you). We may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

### What we do with the information we gather:

We require this information to understand your needs for the following reasons:

- Internal record keeping.
- To contact you following the completion of one of our online forms.
- To contact you to arrange a setting visit.
- To monitor site usage and brochure requests.
- We may use the information to improve our products and services.
- We may periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided.
- From time to time, we may also use your information to contact you for market research purposes.
- We may use the information to customise website content to provide you with a better experience.

## 2. How we collect your personal data:

We collect data about you through a variety of different methods including:

- **Direct interactions:** You may provide data by filling in forms or by communicating with us by post, phone, email or otherwise, including when you:
  - Book appointments to arrange a visit.
  - Share information on our website.
- **We do not** share your data with any party unless we have a legal basis to do so or when your rights override that request.

### 3. How we use your personal data:

We will only use your personal data when legally permitted. The most common uses of your personal data are:

- Booking appointments or visits
- Registering with one of our settings
- Working as an employee

Our legal basis options are:

1. Consent – to share medical data
2. Legal Obligation – required by law
3. Contract – formal agreement between us
4. Vital Interest – life or death situation
5. Public Interest – public event
6. Legitimate Interest – to share information as part of the services we offer

### Marketing communications:

We do not send marketing communications, but we may opt to email you about our relationship together. You may have the option to opt out of this where other communication methods are available when it is appropriate to providing the service to you that we do.

### 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 purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us as above. In doing so we will need to demonstrate why the use your personal data for a purpose unrelated to the purpose for which we collected the data. We would always seek to notify you in advance and explain our new legal ground of processing.

### 4. Disclosure of your personal details:

We may have to share your personal data with parties set out below:

- Other companies in our group who provide IT and system administration services and undertake leadership reporting.
- Service providers who provide IT and system administration services.
- Professional advisers including other agencies, counsellors, medical professionals.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.

We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

We would NEVER transfer your personal data outside the European Economic Area.

## **5. Data Security:**

We are committed to ensuring that your information is secure. 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 such data. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

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

## **6. Data Retention:**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we must keep basic information about our clients (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

## **7. Controlling your personal information:**

You may choose to restrict the collection or use of your personal information in the following ways:

- If you have opted to receive our latest preschool news, services, and updates, you may unsubscribe at any time by following the instructions in the email.
- We will not sell, distribute, or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.
- You may request details of personal information which we hold about you under the Data Protection Act 1998.
- If you believe that any information, we are holding on you is incorrect or incomplete, please write to or email us as soon as possible at the above address. We will promptly correct any information found to be incorrect.

## **8. Your Legal Rights:**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at the above address.

You will not 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 may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). 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.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

## **9. Website Terms and Conditions:**

If you continue to browse and use this website, you are agreeing to comply with and be bound by the following terms and conditions of use, which together with our privacy policy govern Launchpad relationship with you in relation to this website. If you disagree with any part of these terms and conditions, please do not use our website.

The information contained in this website is for general information purposes only. The information is provided by Launchpad and while we endeavour to keep the information up to date and correct, we make no representations or warranties of any kind, express or implied, about the comprehensiveness, accuracy, reliability, suitability, or availability with respect to the website or the information, products, services, or related graphics contained on the website for any purpose. Any reliance you place on such information is therefore strictly at your own risk.

The term 'Launchpad' or 'us' or 'we' refers to the owner of the website whose registered office is Address. The term 'you' refers to the user or viewer of our website.

The use of this website is subject to the following terms of use:

- The content of the pages of this website is for your general information and use only. It is subject to change without notice.
- This website uses cookies to monitor browsing preferences. If you do allow cookies to be used, the following personal information may be stored by us for site usage information: IP address and location.

- Neither we nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.
- Your use of any information or materials on this website is entirely at your own risk, for which we shall not be liable. It shall be your own responsibility to ensure that any products, services, or information available through this website meet your specific requirements.
- This website contains material which is owned by or licensed to us. This material includes, but is not limited to, the design, layout, look, appearance, and graphics. Reproduction is prohibited.
- All trademarks reproduced in this website which are not the property of, or licensed to, the operator is acknowledged on the website.
- Unauthorised use of this website may give rise to a claim for damages and/or be a criminal offence.
- From time to time this website may also include links to other websites. These links are provided for your convenience to provide further information. They do not signify that we endorse the website(s). We have no responsibility for the content of the linked website(s). However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.  
Launchpad have no control over the nature, content, and availability of those sites. The inclusion of any links does not necessarily imply a recommendation or endorse the views expressed within them.
- Your use of this website and any dispute arising out of such use of the website is subject to the laws of England, Northern Ireland, Scotland, and Wales.

In no event will we be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this website.

Every effort is made to keep the website up and running smoothly. However, Launchpad takes no responsibility for, and will not be liable for, the website being temporarily unavailable due to technical issues beyond our control.

**Date of Policy:** Feb 2021

**Revised:**

**Agreed by Board:** Feb 2021

**Next Board Review:** Feb 2023