

PRIVACY AND COOKIES POLICY

We want everyone who supports us, or who comes to us for support and use our services, to feel confident and comfortable with how any personal information you share with us will be looked after or used. This Privacy Policy sets out how we collect, use and store your personal information (this means any information that identifies or could identify you).

The EASE Privacy Policy may change so please remember to check back from time to time, this is version 2.1 was last updated on the 11th May 2023. Where we have made any changes to this Privacy Policy, we will make this clear on our website or contact you about any changes.

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1. Who we are

Here at EASE, we are committed to protecting your personal information and making every effort to ensure that your personal information is processed in a fair, open and transparent manner.

We are a "data controller" and a "data processor" for the purposes of the Data Protection Act 1998 and (from 25 May 2018) the EU General Data Protection Regulation 2016/679 ("Data Protection Law"). This means that we are responsible for, and control the processing of, your personal information.

We are registered with the Information Commissioners Office and our Registration Number is: Z1187113.

2. How we collect information about you

Everything we do, we do to ensure that we can help people using a service to enjoy, support and get the most out of our services. We want to make sure you receive the communications that are most relevant to you, be it through visiting our website or receiving emails, post or phone calls. We want to make sure you receive the best attention when you book a service and register for our services.

We collect information from you in the following ways:

When you interact with us directly: This could be if you ask us about our activities/services, register with us, ask a question about applying for a job or volunteering opportunity or otherwise provide us with your personal information. This includes when you phone us, visit our website or get in touch through the post, or in person.

When you interact with us through third parties: This could be if you provide a donation through a third party such as Just Giving or one of the other third parties that we work with and provide your consent for your personal information to be shared with us.

When you visit our website: We gather general information which might include which pages you visit most often and which services, events or information is of most interest to you. We may also track which pages you visit when you click on links in emails from us. We also use "cookies" to help our site run effectively. There are more details below – see 'Cookies'.

We use this information to personalise the way our website is presented when you visit to make improvements and to ensure we provide the best service and experience for you.

Wherever possible we use anonymous information which does not identify individual visitors to our website.

From other information that is available to the public: In order to tailor our communications with you to your background and interests, we may collect information about you from publicly available sources or through third party subscription services or service providers.

3. Information we collect and why we use it

Personal and Sensitive Personal Information

Personal information we collect includes details such as you/partner/child's name, address, date of birth, gender, telephone, email, if you are pregnant, if you/child has a disability, if you are in receipt of benefits, marital status, employment status, GP's details, country of birth, language spoken at home, religion, ethnicity, consent for photographs/videos, seeking emergency medical care, take children on trips, if you have parental responsibility, allergies, dietary requirements/medication, if your child/ren can walk home alone, designated person to collect your child/ren. You will have given us this information whilst registering for a service for you/your child or an event. We will mainly use this information:

- To provide the services or goods that you have requested.
- To keep a record of your relationship with us.
- Where you volunteer with us, to administer the volunteering arrangement.
- To provide Ealing Council (one of our funders) with some of this data/upload onto their online recording database.
- We will not pass on your details to anyone else without your express permission except in exceptional circumstances. Examples of this might include anyone reporting serious self-harm or posing a threat to others or children contacting us and sharing serious issues such as physical abuse or exploitation.
- To offer the best support for you/your family
- For Evaluating purposes

If you share your personal experience or the experiences of a friend or relative, we may also collect this information with your consent. If you provide us with any Sensitive Personal

Information by telephone, email or by other means, we will treat that information with extra care and confidentiality and always in accordance with this Privacy Policy.

A special note about the Sensitive Personal Information we hold

Data Protection Law recognises that some categories of personal information are more sensitive. Sensitive Personal Information can include information about a person's health, race, ethnic origin, political opinions, sex life, sexual orientation or religious beliefs.

4. Legal basis for using your information

There may be other lawful reasons that allow us to process your personal information and one of those is called 'legitimate interests'. This means that the reason that we are processing information is because there is a legitimate interest for EASE to process your information to help us to achieve our vision of ensuring that everyone using a service gets both support and respect.

Whenever we process your Personal Information under the 'legitimate interest' lawful basis we make sure that we take into account your rights and interests and will not process your personal information if we feel that there is an imbalance.

5. Marketing

We will only contact you about our work and how you can support EASE by phone, email or text message, if you have agreed for us to contact you in this manner.

You can update your choices or stop us sending you these communications at any time by contacting our office 020 8575 6139 or emailing michelle.bailey@empowering-action.org.uk

6. Sharing your Information

The personal information we collect about you will mainly be used by our staff (and volunteers) at EASE so that they can support you.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

EASE may however share your information with our trusted partners and suppliers who work with us on or on our behalf to deliver our services, but processing of this information is always carried out under our instruction. We make sure that they store the data securely, delete it when they no longer need it and never use it for any other purposes.

We enter into contracts with these service providers that require them to comply with Data Protection Laws and ensure that they have appropriate controls in place to secure your information.

Legal disclosure

We may disclose your information if required to do so by law (for example, to comply with applicable laws, regulations and codes of practice or in response to a valid request from a competent authority); or, in order to enforce our conditions of sale and other agreements.

7. Keeping your information safe

We take looking after your information very seriously. We've implemented appropriate physical, technical and organisational measures to protect the personal information we have under our control, both on and off-line, from improper access, use, alteration, destruction and loss.

Unfortunately, the transmission of information using the internet is not completely secure. Although we do our best to protect your personal information sent to us this way, we cannot guarantee the security of data transmitted to our site.

Our websites may contain links to other sites. While we try to link only to sites that share our high standards and respect for privacy, we are not responsible for the content or the privacy practices employed by other sites. Please be aware that advertisers or Web sites that have links on our site may collect personally identifiable information about you. This privacy statement does not cover the information practices of those websites or advertisers.

8. How long we hold your information for

We only keep it as long as is reasonable and necessary for the relevant activity, which may be to fulfil statutory obligations (for example, the collection of Gift Aid).

9. Your rights

You have various rights in respect of the personal information we hold about you – these are set out in more detail below. If you wish to exercise any of these rights or make a complaint, you can do so by contacting our Managing Director, Michelle Bailey, 020 8575 6139 or emailing her on michelle.bailey@empowering-action.org.uk. You can also make a complaint to the data protection supervisory authority, the Information Commissioner's Office - <https://ico.org.uk/>

- **Access to your personal information:** You have the right to request access to a copy of the personal information that we hold about you, along with information on what personal information we use, why we use it, who we share it with, how long we keep it for and whether it has been used for any automated decision making. You can make a request for access free of charge. Please make all requests for access in writing, and provide us with evidence of your identity.
- **Right to object:** You can object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes. Please contact us as noted above, providing details of your objection.
- **Consent:** If you have given us your consent to use personal information (for example, for marketing), you can withdraw your consent at any time.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it.
- **Portability:** You can ask us to provide you or a third party with some of the personal information that we hold about you in a structured, commonly used, electronic form, so it can be easily transferred.

- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.
- **No automated-decision making:** Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You have the right not to be subject to automated decisions that will create legal effects or have a similar significant impact on you, unless you have given us your consent, it is necessary for a contract between you and us or is otherwise permitted by law. You also have certain rights to challenge decisions made about you. We do not currently carry out any automated decision-making.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

10. Cookies

'[Cookie](#)' is a name for a small file, usually of letters and numbers, which is downloaded onto your device, like your computer, mobile phone or tablet when you visit a website.

They let websites recognise your device, so that the sites can work more effectively, and also gather information about how you use the site. A cookie, by itself, can't be used to identify you.

How do we use cookies?

We use cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you come to our website and also allows us to improve the user experience.

The cookies we use

We use the categorisation set out by the International Chamber of Commerce in their [UK Cookie Guide](#).

We use all four categories of cookies:

- Strictly necessary cookies are essential for you to move around our website and to use its features, like our shopping basket and your account.
- Performance cookies collect anonymous information about how you use our site, like which pages are visited most.
- Functionality cookies collect anonymous information that remember choices you make to improve your experience, like your text size or location. They may also be used to provide services you have asked for, such as watching a video or commenting on a blog.
- Targeting or advertising cookies collect information about your browsing habits in order to make advertising relevant to you and your interests.

No cookies, please

You can opt out of all our cookies (except the strictly necessary ones). [Find out how to control and delete cookies](#) in your browser.

But, if you choose to refuse all cookies, you may not receive the full user experience on our website.

If you have any questions about how we use cookies, please [contact us](#).

11. Monitoring

Your communications with our team (including by telephone or email) may be monitored and/or recorded for training, quality control and compliance purposes to ensure that we continuously improve our customer service standards.