

Privacy Policy

Community Sparx CIC is committed to protecting and respecting your privacy.

This policy (together with any other documents referred to on it) sets out the basis on which any personal data we collect from you or that you provide to us will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will protect it.

Why we collect, store and process information about you (the legal basis for processing data).

- We collect, store and process information about you because we have a **legitimate interest** in doing so to enable us to deliver services to you.
- Where we wish to use your contact details for marketing purposes, we will separately seek your **consent** to do so. With-holding of your marketing consent will not affect your ability to use our services.

We will collect information about you when you:

- Contact us by telephone, letter, email or via social media
- Interact with our websites or online services such as registration, online discussions, focus groups, mini polls or surveys
- Become a prospective or actual customer
- Use our online services

We may collect, process and store the following information about you:

- Your contact details
- The content of your communications with us or online
- The number and duration of visits that you make to the various pages of our websites. (For this we use cookies, see our Cookies section below for more information)
- Personal Information, including your full name and contact details, IP address, etc.
- The actions that you take while using services provided by us

We may collect and process the following information about your computer or other devices used to access our services:

- Type of device, operating system, browser type, etc.
- We may collate and process this data in conjunction with other data that is held by us which has been compiled from sources other than those listed above.

What do we do with your information:

- We do not sell personal information to any other company.
- We collect personal information to enable us to communicate with you, to register you to use our services, to help us to identify which of our products and services might be of interest to you and in order to respond to your communications.
- Anonymised information and usage statistics concerning your use of the services and journeys that you make may be used to inform our future development of our products and services.
- By submitting your comments and similar information to us, you agree that we are able to use and publish these in internal company documents, presentations, reports, etc.
- We may also need to share your information with other companies, organisations and individuals we are working with or who are engaged by us to develop hardware and/or software products and/or services. Wherever possible, this data will be anonymised. Beyond this, we will not share without your consent your information with any other organisation unless we are required to do so by law, or if you have made a request for specific information.



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- We may also wish to use some of the information such as comments or testimonials that you have provided in promotional materials or on our website. Unless we have explicitly obtained your consent, we will not disclose any of your personal contact details in doing so.

Where we store your personal information

- The information that we collect from you will be stored within the UK and/or European Union. Where data is to be stored or processed outside of these territories we will endeavour to ensure that is secured and protected by agreements such as the EU/US Privacy Shield. By submitting your personal information, you agree to this.

Disclosure and processing of your information

- We may disclose your personal information to any employee, associate, supplier, contractor or sub-contractor of the company, where it is necessary for them to perform their duties. Our employees, associates, suppliers, contractors and sub-contractors are prohibited from using or disclosing personal information outside of the scope of this policy.
- We may disclose your personal information to third parties:
 - In the event that we sell or buy any business or assets, in which case, where it is necessary, we may disclose your personal data to the prospective buyer or seller of such business or assets
 - If Community Sparx CIC is acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
 - If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements or to protect the rights, property, or safety of Community Sparx CIC, our customers, users of services provided by Community Sparx CIC, staff or others. This includes exchanging information with other companies and organisations for the purposes of debt collection, fraud protection and credit risk reduction

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website or services, you are responsible for keeping this password confidential.

Unfortunately, the transmission of information via the internet is not completely secure. Even though we take steps to protect your personal information, we cannot guarantee the security of information you provide. Any transmission from you to us is at your own risk. Once we have received your information, we will use procedures and security features to try to prevent unauthorised access.

By submitting your personal information, you agree to our storing, transferring or processing your information in accordance with this policy. We will take reasonable precautions to protect your information in accordance with the Data Protection Act, other relevant legislation, regulations and this privacy policy, however, other than where required by law, we cannot be responsible for and exclude all liability for loss of personal data or its misuse by unauthorised persons.

Your rights

You are entitled at any stage to make a written subject access request. You may ask for a copy of your personal information stored in our systems, for your personal information to be amended or deleted from our live systems and you may ask for us to suspend processing of your information for marketing purposes. Where reasonable and practical, we will carry out your request. Requests should be directed to the Data Protection Officer via email at info@communitysparx.org.uk.

Other websites

Our site or services may, from time to time, contain links to the websites of our partners, affiliates, other information providers, social media and advertisers. If you follow a link to any of these websites, please note that we do not accept any responsibility or liability for the security of these websites or for their privacy policies. Please take precautions to protect the security of your computer and browsing and check their policies before you submit any personal data to these websites.



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How to unsubscribe

Our policy is to allow members to unsubscribe from our website, mailing or marketing lists. You can do this by emailing the web manager at info@communitysparx.org.uk, by clicking on unsubscribe links if provided or by writing to us at our Registered Office.

If you have asked to unsubscribe and this hasn't happened it may be because the address to which we are sending emails is not the same as the address your request was sent from. Please check the address we are using and include this information in your request.

If you are a user of a service provided by an organisation using a Community Sparx service, please contact the administrator of that organisation. Unless Community Sparx CIC is the designated data controller, it cannot directly process service unsubscribe requests.

Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on our website or the relevant online service. Those changes will then apply to future use by you of our website.

Contact

Questions, comments and requests regarding this privacy policy should be addressed to the data controller by post or via email at info@communitysparx.org.uk.

Cookies and Tokens

Cookies and Tokens are small files that are stored on your computer when you visit a website or use an online service. They are mainly used as a way of verifying your identity, delivering or improving functionality or to provide more advanced statistical data.

We may obtain information about your usage of our website or services by using a cookie or token. It will help us to improve our site and to deliver a better and more personalised service. Some of the cookies and tokens we use are essential for the site or service to operate.

If you register with or continue to use our site or a service provided by us, you agree to our use and storing of cookies and tokens on your computer.

Analytics

Our website uses Google Analytics and or similar tools which rely on cookies to generate visitor charts and data mining reports. Google Analytics and similar tools collect anonymous information that will not be used to identify our website visitors.

Controlling Cookies

You can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site or services. Unless you have adjusted your browser setting so that it will refuse cookies, our system may issue cookies or tokens as soon as you visit our website.

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