

## Our privacy and cookies policy

### Who we are

Space is the charity that manages and runs the Broomhouse Centre. The Broomhouse Centre, trading as Space, and managing the Broomhouse Hub, is a Registered Charity No, registered in Scotland SC003706, & Company Limited by Guarantee, registered in Scotland SC320027. Its registered address is above. This policy applies to all of these entities, which are referred to as 'Space' throughout this document.

### What this privacy and cookie policy covers

Space is committed to protecting your information, whether you are a donor, volunteer, shopper or campaigner. This policy explains how Space and all of its subsidiaries may collect and use the information you provide to us and that we collect, whether online, via phone, email, in letters or in any other correspondence.

We ensure that if we use your information, we do it in accordance with all applicable laws concerning data protection. This policy explains:

- What information Space may collect about you;
- How we may use that information;
- Whether we might disclose your details to anyone else;
- Your choices regarding the information you provide to us; and
- How we may use cookies to provide services to you or to improve your use of our websites.

By using our website or any of our services, or providing us with any data, you agree it being used and disclosed in the manner set out in this policy. This Privacy Policy may be updated from time to time so you may wish to check it each time you submit information to us. The date of the last update is given at the bottom of the page. Where there are material changes to this policy we will either contact you directly or place a new article in the 'News' section of our website.

### Information collection

We may collect information in the following ways:

- **Information you give us.** For example, when you engage with our social media or message boards, make a donation to us, register for an event or service or otherwise provide us with information. When you register, we'll ask for information, like your name, email address and telephone number to store with your account.

By submitting your details using forms on our website, you enable us (and where applicable any suppliers we may use) to raise funds and to provide you with the goods, services, information, activities or online content you select and any other related services Space may provide.

- **Information from third parties.** We may receive information about you from trusted partners with who we work closely together in performance of our work, as explained in the 'Information sharing and disclosure' section below. Under certain circumstances, information may be sent to us as part of a referral from, for example, a public authority, to allow us to make contact with someone who may need our support.
- **Publicly available information.** This can include information obtained online or other media, such as potential donors (for example, to identify their motivations for donating), public figures (for example, MPs or local authority figures), and future candidates for employment. Any such information would be obtained in relation to specific events or projects and will be deleted as soon as it is no longer required.

We do not usually collect 'sensitive personal data' about our supporters unless there is a clear reason for doing so, such as participation in a marathon or similar fundraising event or where we need this information to ensure that we provide appropriate facilities or support to enable them to participate in an event. Health information may be collected if you tell us about your experiences relating to heart disease (for example, if you call our helpline, act as a case study for us or volunteer to be a 'Heart Voice'); however we will make it clear to you when collecting this information as to what we are collecting and why.

### Website users

Information on cookies can be found further down the page.

## Job applicants

If you apply to work at Space in any capacity, the information you give us may only be used to process your application and to monitor recruitment statistics. If we want to disclose information to someone outside Space, for example, if we need a reference, we will make sure we tell you beforehand, unless we are required to disclose this information by law.

If you are unsuccessful in your work application, your information may be held for up to 6 months after we've finished recruiting for the post you applied for. We keep de-personalised statistical information about applicants to develop our recruitment processes however no individual applicant would be identifiable from this information. If you commence employment or any working relationship with Space, your data will be processed in accordance with your employment contract and other applicable policies.

## How we may use your information

Your information may be used for a number of purposes including the following:

- To provide you with the services, products or information you have requested or which we feel may interest you where you have consented to being contacted;
- To process donations we may receive from you;
- To fundraise in accordance with our internal policies and procedures;
- To create an account for you if you register with us;
- To provide you with information about our work or our activities that you have agreed to receive;
- To fulfil sales contracts you have entered into with us;
- To invite you to participate in interactive features on our website when you choose to do so;
- For administration purposes (for example we may contact you regarding a donation you have made or the event you have registered for);
- For internal record keeping, including the management of any feedback or complaints;
- To invite you to participate in surveys or research (although this is voluntary);
- We may analyse the information we collect about you and add publicly available information to create a profile of your interests, preferences and level of potential

donations so that we can contact you in the most appropriate way and with the most relevant information;

- Where it is required or authorised by law; and
- We may assess your information for the purposes of credit risk reduction or fraud prevention.

If you enter your contact details into one of our online forms, we may use this information to contact you, even if you don't click 'submit' on the form. We will do this to see if we can help with any problems you might be experiencing with the form or with our websites, or to see if you would like to continue the action you were taking on the form.

### **Marketing materials**

We may contact you for marketing purposes by email or text message if you have agreed to be contacted in this manner. By subscribing to our marketing emails and providing us with your email address, or by not selecting the option to opt out of receiving email communication from Space, you grant us the right to use the email for both email marketing purposes and advertisement targeting. We may also send you service communications via email or text, for example where you place an order for goods or services on our website.

If you have provided us with your postal address or telephone number we may send you direct mail or telephone you about our work unless you have told us that you would prefer not to receive such information.

It is your choice as to whether you want to receive information about our work, how we raise funds and the ways you can get involved. If you do not want us to use your information in these ways please tick the relevant box situated on the form on which we collect your data.

You may opt-out of our marketing emails at any time by clicking the 'unsubscribe' link in at the end of our emails, and can opt-out of receiving marketing texts by sending us an "opt-out" text message, following the instructions we provide you in our initial text.

You can also change any of your contact preferences at any time (including telling us that you don't want us to contact you for marketing purposes by telephone, or by post) by contacting us using the email address at the top of this page.

Your information will not be used for marketing purposes if you have indicated that you do not wish to be contacted for such purposes. However, your details will be retained on a suppression list to help ensure that we do not continue to contact you for these purposes.

## Information sharing and disclosure

In addition to the circumstances outlined elsewhere within this policy, your information may be shared with other Space entities, trading subsidiaries, suppliers or service providers only to provide the products or services you've requested where, for example, we use a separate company to deliver goods to you.

Your information may be shared with selected third parties, which would include our trusted partners that work with us in connection with our charitable purposes, and other entities that act as fundraisers for Space, sell Space products or provide Space information and marketing (subject to your communication preferences and our internal policies and procedures). From the outset of any relationship with any such third party which may require the sharing of personal information, a data-sharing agreement will be put in place containing a contractual requirement for all parties in the relationship to comply with the terms of this policy as well as all applicable GDPR regulations.

Rest assured, we will never share, sell or swap your details with any third parties for the purposes of their own marketing or the monetising of your data.

Your information may be disclosed to third parties if we are under a duty to disclose your personal data in order to comply with any legal obligation (for example to government bodies and law enforcement agencies), or in order to enforce or apply our rights (including in relation to our website or other applicable terms and conditions) or to protect Space, for example in cases of suspected fraud or defamation.

### Under 18s

We are committed to protecting the privacy of the young people that engage with us through our prevention, survival and support services for young people on our website, at events and at schools.

Our fundraising events also request specific information about the age of participants. If you are under 18 and would like to get involved, please ensure that you have consent from a parent or guardian before giving us your personal information. When information is collected about a child or young person aged under 18 it will be made very clear as to the reasons for collecting this data and how it may be used.

## **Inappropriate website content**

If you post or send any content that we believe to be inappropriate, offensive or in breach of any laws, such as defamatory content on our forums or social media pages, your personal information may be used to inform relevant third parties such as your internet provider or law enforcement agencies.

## **Where we may store your information**

For financial and technical reasons your information may, on occasion, be needed in order to use the services of a supplier outside the European Economic Area (EEA), however such information will be held in compliance with applicable European data protection regulations. By submitting your personal information you agree to this transfer, storing or processing at a location outside the EEA. All reasonably necessary steps will be taken to ensure that your information is kept securely and in accordance with this privacy policy, and ensuring that it is:

- Handled fairly and lawfully
- Kept for limited purposes as outlined in this policy
- Only retained to a level that is adequate, relevant and not excessive
- Accurate and up to date
- Not retained for longer than necessary
- Processed in line with the data subject's rights
- Stored securely

All personal information in electronic format is encrypted and stored on secure servers, with a firewall in place to guard against unsolicited access from outwith Space. Access to folders is restricted by password according to the relevance of the folder's contents to each individual user, with monitoring reviews of these access rights being performed regularly.

Where personal information cannot be held electronically, the hard-copy documentation is securely stored in a locked office.

Records will be kept for as long as required to operate the service in accordance with legal requirements and tax and accounting rules. When your information is no longer required, it will be disposed of in a secure manner.

## **Individuals' Privacy Rights**

Under GDPR regulations, individuals have the right to:

- be informed about the collection and use of their personal data

- access and receive a copy of their personal data, and other supplementary information
- have inaccurate personal data rectified, or completed if it is incomplete
- have personal data erased
- request the restriction or suppression of their personal data
- obtain and reuse their personal data for their own purposes across different services
- object to the processing of their personal data in certain circumstances
- be informed about automated processing of personal data

The rights for individuals summarised above are not absolute and conditions and/or exclusions apply in most cases. Refer to the [Information Commissioner's Office's website](#)<sup>1</sup> for further details. To enact any of these rights, you should contact Space using the email address at the top of this page.

Should you have any concerns about our policy, or our enforcement of it, you should email us at the contact details above. Our Complaints Policy is available upon request. You also have the right to make a complaint at any time to the [Information Commissioner's Office \(ICO\)](#)<sup>2</sup>, although we would encourage you to contact us in the first instance.

## **Cookies**

Cookies are small text files that are automatically placed onto your device by some websites that you visit. They are widely used to improve the performance of a website, for saving different options and to provide website owners with information on how the site is being used.

Cookies are not currently used by Space to collect personal information of visitors to its website.

ENDS

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<sup>1</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

<sup>2</sup> <https://ico.org.uk/make-a-complaint/>