

Privacy Policy

01 March 2022

01 August 2023

08 April 2025

1. Overarching Policy Statement

1.1. We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

1.2. We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

2. Key terms

2.1. It would be helpful to start by explaining some key terms used in this policy:

We, us, our	Holding Space
Our data protection officer	Grant Sanders
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic data Biometric data (where used for identification purposes) Data concerning health, sex life or sexual orientation
Data subject	The individual who the personal data relates to

3. Personal data we collect about you

3.1. The personal data we collect about you depends on the particular service we provide to you. We will collect and use the following personal data about you:

3.1.1. your name and contact information, including email address and telephone number

3.1.2. information to check and verify your identity, eg your date of birth

3.1.3. your gender, if you choose to give this to us

3.1.4. location data, if you choose to give this to us

3.1.5. details about your personal circumstances including sensitive information

3.2. We collect and use this personal data for the purposes described in the section 'How and why we use your personal data' below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

4. How your personal data is collected

4.1. We collect most of this personal data directly from you—in person, by telephone, text or email and/or via our website.

4.2. from cookies on our website—for more information on our use of cookies, please see our cookie policy <https://www.holdingspace.org.uk/policies/privacy-policy>

5. How and why we use your personal data

5.1. Under data protection law, we can only use your personal data if we have a proper reason, eg:

5.1.1. where you have given consent;

5.1.2. to comply with our legal and regulatory obligations;

5.1.3. for the performance of a contract with you or to take steps at your request before entering into a contract; or

5.1.4. for our legitimate interests or those of a third party. A legitimate interest is when we have a charity or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

5.2. The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	To perform our services
Preventing and detecting fraud against you or us	For our legitimate interest, ie to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our service users and verify their identity	Depending on the circumstances: —to comply with our legal and regulatory obligations —for our legitimate interests
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring charity policies are adhered to, eg policies covering security and internet use	For our legitimate interests, ie to make sure we are following our own internal procedures so we can deliver the best service to you
Operational reasons, such as improving efficiency, training and quality control	For our legitimate interests , ie to be as efficient as we can so we can deliver the best service to you at the best price
Ensuring the confidentiality of sensitive information	Depending on the circumstances: —for our legitimate interests, ie to protect sensitive information; —to comply with our legal and regulatory obligations
Statistical analysis to help us manage our charity, eg in relation to client base, or other efficiency measures	For our legitimate interests, ie to be as efficient as we can so we can deliver the best service to you
Preventing unauthorised access and modifications to systems	Depending on the circumstances: —for our legitimate interests, ie to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations
Protecting the security of systems and data used to provide the services	To comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
	We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, ie to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us
Updating and enhancing client records	Depending on the circumstances: —to perform our service with you or to take steps at your request —to comply with our legal and regulatory obligations; —for our legitimate interests, eg making sure that we can keep in touch with our clients
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: —to comply with our legal and regulatory obligations; —for our legitimate interests, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former clients —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests, ie to promote our charity to existing and former clients

6. How and why we use your personal data—in more detail

More details about how we use your personal data and why are set out in the table below.

Purpose	Processing operation	Lawful basis relied on under the UK GDPR[and EU GDPR]	Relevant categories of personal data
Communications with you not related to marketing, including about changes to our terms or policies or changes to the service or other important notices (other than those addressed above)	Addressing and sending communications to you as required by data protection laws, ie: the UK GDPR or Data Protection Act 2018;	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	your name, address and contact information, including email address and telephone number
	Addressing and sending communications to you as required by law	Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))	your name, address and contact information, including email address and telephone number
	Addressing and sending communications to you about changes to our terms or policies or changes to the service or other important notices	Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you	your name, address and contact information, including email address and telephone number

7. How and why we use your personal data—Special category personal data

7.1. Certain personal data we collect is treated as a special category to which additional protections apply under data protection law:

7.1.1.including personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or medical data

7.2. Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

7.2.1.we have your explicit consent;

7.2.2.the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent; or

7.2.3.the processing is necessary to establish, exercise or defend legal claims.

8. How and why we use your personal data—sharing

8.1. See 'Who we share your personal data with' for further information on the steps we will take to protect your personal data where we need to share it with others.

9. Marketing

9.1. We will use your personal data to send you updates (by email, text message, telephone or post) about our services.

9.2. We have a legitimate interest in using your personal data for marketing purposes (see above 'How and why we use your personal data'). This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

9.3. You have the right to opt out of receiving marketing communications at any time by:

9.3.1.contacting us at on our website <https://www.holdingspace.org.uk/contact-us>

9.3.2.replying 'unsubscribe' to our emails

9.3.3.We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our charity.

9.3.4.We will always treat your personal data with the utmost respect and never sell it with other organisations for marketing purposes.

10. Who we share your personal data with

- 10.1. We may share personal data with:
- 10.1.1. third parties we use to help deliver our services to you
 - 10.1.2. other third parties we use to help us run our charity, eg marketing agencies or website hosts;
 - 10.1.3. third parties approved by you, eg social media sites you choose to link your account to or third party payment providers;
- 10.2. If you would like more information about who we share our data with and why, please contact us (see 'How to contact us' below).

11. Where your personal data is held

- 11.1. Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

12. How long your personal data will be kept

- 12.1. We will not keep your personal data for longer than we need it for the purpose for which it is used.
- 12.2. If you no longer have an account with us or we are no longer providing services to you, we will delete or anonymise your account data after seven years.
- 12.3. Following the end of the of the relevant retention period, we will delete or anonymise your personal data.

13. Your rights

- 13.1. You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
Erasure (also known as the right to be forgotten)	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or

	transmit that data to a third party—in certain situations
To object	<p>The right to object:</p> <p>—at any time to your personal data being processed for direct marketing (including profiling);</p> <p>—in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims</p>
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you
The right to withdraw consents	<p>If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time</p> <p>You may withdraw consents by [insert details as relevant depending on consents]</p> <p>Withdrawing a consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn</p>

13.2 For more information on each of those rights, including the circumstances in which they apply, please contact us (see **'How to contact us'** below) or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights](#).

13.3 If you would like to exercise any of those rights, please:

13.3.1 email, call or write to us—see below: **'How to contact us'**; and

13.3.1.1 provide enough information to identify yourself e.g. your full name, address and any additional identity information we may reasonably request from you;

13.3.1.2 let us know what right you want to exercise and the information to which your request relates.

14. Keeping your personal data secure

- 14.1. We have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal data to those who have a genuine need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.
- 14.2. We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.
- 14.3. If you want detailed information from Get Safe Online on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading charities.

15. How to complain

- 15.1. Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.
- 15.2. You also have the right to lodge a complaint with:
 - 15.2.1. the Information Commissioner in the UK who may be contacted using the details at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

16. Changes to this privacy policy

- 16.1. This privacy notice was published on 1st March 2022 and last updated on 8th April 2025.
- 16.2. We may change this privacy notice from time to time—when we do we will inform you via our website.

17. How to contact us

17.1. Individuals in the UK

You can contact us by post, email or telephone if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Holding Space



Charity no. 1194399

Our contact details are shown below:

Holding Space
7 Hyde Gardens
Eastbourne
BN21 4PN
contact@holdingspace.org.uk
01323 315 005