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## PHOENIX SPACE CIO - PRIVACY POLICY

Phoenix Space CIO is the **data controller** responsible for the processing of personal data described in this Privacy Policy.

PHOENIX SPACE CIO (referred to as “**we**”, “**us**” or “**our**”) is committed to protecting the privacy and personal data of our beneficiaries, donors, supporters, partners, volunteers and visitors to our website.

This privacy policy explains how we collect, use, share and protect personal data, and describes the rights individuals have under applicable data protection law, including the UK General Data Protection Regulation and the Data Protection Act 2018.

### 1. CONTACT DETAILS

Address:

PHOENIX SPACE CIO

33 Boston Road

Holbeach, Spalding

Lincolnshire PE12 7LR

Data Protection Contact:

Alevtina Nepomniachtchikh

Email:

info@phoenixspace.org

Alevtina Nepomniachtchikh acts as the organisation's **designated contact for data protection matters**.

## **2. WHAT DATA WE COLLECT, USE, AND WHY**

We may collect or use the following personal information to provide educational programmes and services:

### **BENEFICIARIES**

- Names
- Contact details
- Date of birth
- Addresses
- Email addresses
- Educational information and academic history
- Employment status
- Details relating to programme participation

Some of the personal data we process may relate to **children or young people participating in our programmes**. Where this occurs, we take additional care to ensure that such data is processed fairly, securely, and only where appropriate safeguards are in place.

### **DONORS AND SUPPORTERS**

We may collect or use the following information:

- Names
- Contact details
- Email addresses
- Addresses
- Payment details (including card or bank information for transfers and direct debits);

- Account information, including registration details;
- Transaction data, including details about payments from donors and beneficiaries and other details of donations and support provided.
- Donor fundraising preferences;
- Website and app user journey information;
- Records of consent, where appropriate.

## **FUNDRAISING AND COMMUNICATIONS**

We may collect:

- Names and contact details
- Donor communication preferences
- Records of consent for marketing communications

We use platforms such as Mailchimp to manage mass email communications and newsletters.

We will only send marketing communications where individuals have **provided consent** or where otherwise permitted under applicable law.

Individuals may withdraw consent or unsubscribe at any time.

## **WEBSITE USE:**

We may collect or use the following information for website monitoring purposes and in relation to the use of cookies or similar technologies:

We may collect information about how visitors use our website, including:

- Usage data, such as pages visited and interactions with the website
- Technical data, including Internet Protocol (IP) address, browser type and device information
- Subscription preferences and communication choices

This information may be collected using cookies and analytics tools such as Google Analytics.

### 3. PROCESSING OF SPECIAL CATEGORY DATA

In some circumstances, particularly in relation to beneficiaries participating in our programmes, we may process limited amounts of **special category personal data**, such as information relating to:

- nationality
- ethnicity
- health
- disability
- circumstances of displacement

Where this occurs, we ensure that such information is processed **only where necessary** and in accordance with applicable data protection law.

We apply appropriate safeguards and rely on relevant conditions under the UK General Data Protection Regulation and the Data Protection Act 2018, including where processing is necessary for **substantial public interest or the provision of charitable services to vulnerable groups**.

#### **Safeguards:**

- Data stored on secure, GDPR-compliant platforms
- Limited access: only authorised personnel can view or process special category data
- Files are restricted, and access to such data is restricted to authorised personnel only.

### 4. PARTNER RESPONSIBILITY & CONSENT

We rely on our partners to ensure that students and programme participants provide explicit consent, particularly for:

- Use of their personal data in surveys
- Publication of their images in social media posts, media, and reporting documents

For participants under the age of 16, parental or guardian consent is obtained where required. On all surveys and data collection forms, we clearly note:

- The purpose of the data collection

- That we do not share personal data with any third party outside of Phoenix Space or authorised partners

## **5. COOKIES AND WEBSITE TRACKING**

Our website uses cookies and similar technologies to improve functionality, analyse usage, and enhance the user experience.

Cookies are small text files placed on your device when you visit a website. They allow websites to recognise your device and store certain information about your preferences or actions.

We use a consent management platform to manage cookies on our website.

When you first visit our website, you will be presented with a cookie banner allowing you to accept or decline non-essential cookies.

Types of cookies we use

### **Strictly necessary cookies**

These cookies are essential for the operation of our website and enable core functionality such as security and accessibility. These cookies do not require consent.

### **Analytics cookies**

We may use analytics tools such as Google Analytics to help us understand how visitors use our website, for example which pages are visited most frequently. This information helps us improve the website.

Analytics cookies will only be placed on your device if you provide consent through the cookie banner.

Managing your cookie preferences

You can manage or withdraw your consent for non-essential cookies at any time by adjusting your preferences through the cookie settings available on our website.

Most web browsers also allow you to control cookies through their settings. Please note that disabling certain cookies may affect the functionality of the website.

## 6. PURPOSES AND LAWFUL BASES FOR PROCESSING PERSONAL DATA

To the extent relevant, we may use the personal information we collect from you when it is necessary for the following purposes:

Purpose for processing	Lawful basis for processing
To provide services and education to beneficiaries.	Performance of a contract Legitimate interests
To provide you with communications when you have subscribed to receive them.	Performance of a contract Consent Legitimate interests
To promote our services to donors and beneficiaries, fundraising and promotional activities.	Consent Legitimate interests
To have a better understanding of donors and to undertake due diligence in respect of them. For example, we may process personal information from the following publicly available sources: Companies House, the Electoral Register and the media. This is in order to help us to understand more about you and your ability to support the charity. We may also use publicly available sources to carry out due diligence on donors to meet the requirements of anti-money laundering regulations.	Legitimate interests Legal obligation
To undertake donor fundraising	Legitimate interests
To manage accounts and records.	Legitimate interests
To address enquiries and requests for information or services.	Legitimate interests
For compliance with a legal obligation in domestic law to which we are subject.	Legal obligation

When we have obtained your active agreement to use your personal data for a specified purpose, for example, if you subscribe to an email newsletter.	Consent
In connection with any legal proceedings, or in order to establish, exercise or defend our legal rights	Legitimate interests Legal obligation
In connection with monitoring use of our website, for example, we may collect information about your usage of the website (for example, URL, IP address, domain types like .co.uk and .com, your browser type, type of device, your age, location and the pages of our website that were viewed during your visit). All the abovementioned information will be stored in an anonymised format.	Legitimate interests
In connection with our use of essential cookies or similar technologies.  "Cookies" are small text files created and stored on your hard drive by your internet browser software, in order to hold relevant information about the web page you are currently viewing. They help us to improve the website and to deliver a better and more personalised service.  [For further information on our use of cookies, please see section 4].	Legitimate interests

When we rely on legitimate interests, we make sure we consider and balance any potential impact on your rights and freedoms before we process the personal information for our legitimate interests and do not rely on this lawful basis where your rights outweigh our interest in undertaking the processing.

In some circumstances, we may process personal data where necessary to **protect the vital interests of an individual**, including safeguarding concerns or situations involving risk of harm.

We always provide you with the choice to opt in to direct marketing from PHOENIX SPACE CIO (which includes email updates, invitations to events, and fundraising appeals). Furthermore, data subjects can opt out or withdraw consent from receiving any promotional materials at any time by contacting us by email on [info@phoenixspace.org](mailto:info@phoenixspace.org).

To ensure accountability and demonstrate our compliance with UK GDPR, Phoenix Space maintains a Data Processing Register. This register records all processing activities, the data collected, lawful bases, and safeguards. We review and update it regularly to reflect any new processing activities." That ties it in naturally and shows it's an active part of your compliance process.

## **7. DONOR FUNDRAISING**

As part of our major donor fundraising activities, we undertake research and profiling of supporters and prospective supporters who may have an interest in, and financial ability to, support our mission.

As explained above, for this reason, we may gather information about donors from publicly available sources - for example, Companies House, the Electoral Register and the media - to help us to understand more about donors and their ability to support the charity. We may also use publicly available sources to carry out due diligence on donors to meet the requirements of anti-money laundering regulations. However, we do not carry out wealth screening and we do not conduct research beyond paywalls.

Carrying out research and processing in this way allows us to conduct high-value fundraising, which is essential for our legitimate interests - in this case, our ability to run our grant-making programmes. We will always endeavour to do so with great care and in a way that does not unduly impact your rights and freedoms.

You can object to and opt out of your personal information being used for profiling by contacting us at any time by emailing [info@phoenixspace.org](mailto:info@phoenixspace.org).

## **8. WHO MAY WE SHARE YOUR INFORMATION WITH?**

We may share your personal data where necessary and in line with data protection laws with:

- Trustees, staff, and volunteers of Phoenix Space CIO on a need-to-know basis
- Service providers who support our operations (such as IT systems, cloud storage, CRM platforms, survey tools, and communications services)
- Payment processors and financial service providers (for donations and financial transactions)
- Partner organisations involved in delivering our programmes, where data sharing is necessary and appropriate
- Professional advisors (such as legal, financial, or audit services)
- Regulatory authorities, including the Charity Commission, where required by law

**We do not sell personal data and only share information where there is a lawful basis to do so.**

## **9. PLATFORMS WE USE**

Personal data may be stored and processed using the following platforms, all of which are GDPR-compliant:

- **Google Drive / Google Sheets** - for programme and administrative data
- **Kobo Toolbox** - for survey collection
- **Mailchimp** - for newsletters and communications
- **Google Analytics**- for website user data.
- Other secure, authorised platforms as required for programme delivery

## **10. WHO MAY WE RECEIVE INFORMATION FROM?**

We may receive information directly from data subjects, including :

- Beneficiaries
- Donors
- Supporters

As described above, we may also obtain personal information from some third-party sources; for example, in order to conduct due diligence on donors.

## **11. DATA RETENTION**

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of the personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

We will normally keep personal information throughout the period of time that we are providing services to you or receiving support from you, and afterwards for a period of **six years**, taking into account applicable laws and also the regulations that apply to us.

## 12. INTERNATIONAL TRANSFERS

We may from time to time transfer your personal data to a country outside of the UK; for example, for the purposes of cloud storage and third-party usage.

Where we do so, we will ensure that either:

- The transfer is to a territory subject to an adequacy finding as a matter of UK law (as is the case for example for certain transfers to Ireland or if the transfer falls within scope of the UK Extension to EU-US Data Privacy Framework) or that appropriate safeguards are in place for the transfer of your information outside the UK (for example, the US) such as standard contractual clauses together with any supplementary measures required.

## 13. WHAT RIGHTS DO YOU HAVE?

You have rights in relation to the processing of your personal information:

These are:

- The right to be informed. This means that we must tell you how we use your personal information, and this is the purpose of this privacy policy.
- The right of access. You have the right to access personal information relating you that we hold.
- The right for any inaccuracies to be corrected. If any personal information that we hold about you is incomplete or inaccurate, you are able to require us to correct it.
- The right to have information deleted. If you would like us to stop processing your personal information, you have the right to ask us to delete it.
- The right to restrict the processing of your personal information. You have rights to ask us to 'block' or suppress further use of your information, with certain exceptions..
- The right to portability. You have the right to obtain and reuse your personal data in a structured, commonly used and machine-readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
- The right to object to processing. You have the right to object to certain types of processing, in certain circumstances. In particular, you have the right to object to the processing of your personal information based on legitimate interest grounds, including automated processing such as profiling.

- The right to withdraw consent at any time, where we rely on consent as the lawful basis for processing your data

These are not absolute rights and may be subject to exceptions depending on the context and the reason we are processing your personal information.

If you wish to exercise any of the rights summarised above, please contact us by email on [info@phoenixspace.org](mailto:info@phoenixspace.org).

#### **14. WHO CAN YOU COMPLAIN TO?**

If you are unhappy about how we are using your information or how we have responded to a request you have made, then we encourage you to first contact us by email [info@phoenixspace.org](mailto:info@phoenixspace.org).

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/> or <https://ico.org.uk/make-a-complaint/>.

#### **15. CHANGES TO THIS PRIVACY STATEMENT**

We may amend this privacy policy from time to time.

#### **16. HOW TO CONTACT US**

If you have questions about this Privacy Statement or require further information, please contact us by email on [info@phoenixspace.org](mailto:info@phoenixspace.org).

This policy was last updated on **01/04/2026**

