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Privacy and Cookie Policy

[www.bristolafterstroke.org.uk](http://www.bristolafterstroke.org.uk)

**Our privacy and cookies policy**

This document is a Privacy and Cookie Policy. The purpose of this policy is to let you know, as the user of our website: [www.bristolafterstroke.org.uk](http://www.bristolafterstroke.org.uk), what we do with your personal data when you visit our site.

The overall purpose of our website is to provide information about the activities of Bristol After Stroke.

In this Privacy and Cookie policy we also explain how we manage the personal and sensitive data of individuals who engage with Bristol After Stroke activities.

The contact person for this policy is: Rebecca Sheehy (rebecca.sheehy@bristolafterstroke.org.uk)

**Who are we?**

In this policy, whenever you see the words ‘we’, ‘us’ or ‘our’, it refers to Bristol After Stroke.. Bristol After Stroke is the Registered charity – no. 287554.

**We respect your right to privacy on and offline and understand that you want to keep control of your personal information. That’s why we are committed to protecting any information you share with us in compliance with the** [**General Data Protection Regulation**](https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-does-general-data-protection-regulation-gdpr-govern_en) **(GDPR) and** [**Data Protection Act 2018**](http://www.legislation.gov.uk/ukpga/2018/12/section/1/enacted) **(DPA 2018).**

**Personal data – Information we collect**

‘Personal data’ means information that identifies you as a person. This can include your name, address, email address, mobile number and other information that relates to you, as well as IP addresses and other technical information.

In some cases, it can include ‘sensitive data’, meaning information that may include data about physical or mental health or condition, age or ethnicity.

Through our website we collect the following personal information:

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | **Audience group** | **Categories of personal data** | **Purpose for processing** | **Legal basis for processing** |
| 1.1 | Website user | Website analytics: we collect your IP address, geographical location, browser type, operating system and length of visit. | To measure the effectiveness of our website and inform improvements to the website | Legitimate interest - to communicate our core services online |
| 1.2 | Newsletter Subscriber | First name | To respond to and support your enquiry | Legitimate interest - to communicate with existing, and potential, clients |
| 1.3 | Newsletter Subscriber | Email Address |
| 1.4 | Contact enquiry  | First and last name |
| 1.5 | Contact enquiry  | Email address |
| 1.6 | Contact enquiry  | Contact number |

**Sensitive data**

We are committed to ensuring equality to all, irrespective of gender, disability, ethnicity, marriage, sexual orientation, religion or belief, or social-economic background.

To do this, we may need to monitor the data trends of those applying to work with us or to participate in our programmes.

Sensitive personal information e.g. ethnicity, gender or disability is anonymised before being used for equal opportunities monitoring and reporting.

Sensitive data will only be used for other purposes if it is essential for us to deliver our service to you effectively, and if we have lawful bases to do so, as outlined in this Privacy Policy.

**How we protect your data**

We aim to collect the minimum of personal information needed to provide an effective service.

We will never sell, distribute or intentionally make your personal information public.

We have systems in place to safeguard your personal data. We have implemented appropriate technical and organisational security measures to protect the data you share with us from loss and preserve its security and confidentiality.

Access to written and electronic personal data is restricted and has a level of security, e.g. is password protected and encrypted depending on the sensitivity of the data.

**How we use personal data**

We collect and process information about you only where we have legal bases for doing so. The legal bases will depend on the individual services you use and how you use them.

**Our legal bases for using your information**

**Consent**

In some cases, we are processing your personal information because you have given us consent to do so.

Information will be presented in a clear way and we will ensure that when seeking consent from young people, they are supported through the decision-making process by us and/or their parents and guardians where legitimate.

In cases where you have consented to our use of your personal information for a specific purpose, you have the right to change your mind at any time. To withdraw consent, please email office@bristolafterstroke.org.uk.

### Media consent

Media consent will be sought prior to any use of media we gather including, but not limited to, video, audio, photography etc. Material will only be used for as long as consent has been given, and in respect of the consent given.

Parental/guardian permission is obtained prior to filming or photographing children under 16 and young people up to the age of 25 who lack the capacity to make informed decisions themselves.

### Marketing communications consent

### If you have consented to us contacting you with our news and information, we will give you the chance to opt out of receiving them every time we send them.

### Legitimate interests

We use your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests.

Specifically, we have a legitimate interest in:

* Providing you with a service: if you contact us by email about our programmes or work, we will use the personal data you provide to answer your question or resolve your problem;
* Protecting our clients and ensuring we have relevant next of kin or family contacts where required
* Referring you to services you may require which are delivered by other health and social care providers

When relying on ‘legitimate interests’, we take responsibility for identifying the risks and consequences of the processing and put appropriate safeguards in place.

Where we are using your information because we have a legitimate interest to do so, you have the right to object to that use, but in some cases, this may mean you are no longer able to access our services.

**Necessary for a contract**

We will need to use your information in order to perform our obligations under a contract with you. For example, we need your name and contact details so that we can send you tickets for a performance that you want to attend.

We may also use your personal data to enforce our terms and conditions and payment procedures and collection.

**Legal obligation**

We need to process your data to comply with a legal obligation, including our health and safety obligations.

We may disclose your personal data if required to do so by a law enforcement court or government agency or in the good faith that such action is necessary to comply with a legal obligation, or to protect ourselves against legal liability.

**Vital interests**

We may use your personal information to act in urgent circumstances to protect yours or someone else’s personal safety.

If we intend to use any personal data in any manner which is not consistent with this Privacy Policy, you will be informed prior to or at the time of which we collect the data; or we will obtain your consent prior to such use.

**Third party data processors**

All our third-party data processors have been carefully chosen as service suppliers who also practice responsible data handling. We believe that each has in place appropriate protections to ensure the security of the data we store or process with them and have clear policies for how they treat that data. But if in doubt, you should review their individual Privacy Policies.

**Sending your information to other countries**

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may:

* Store your information on computer servers based overseas; or
* Communicate with you when you are overseas (for example, when you are on holiday or if you live in a different country)

**Disclosure of Information - Personal data sharing**

Like many organisations, we sometimes engage other people or companies to perform certain charity-related functions such as training, ticketing fulfilment, maintaining databases and processing payments - or to work with us as delivery partners.

We may provide them with information including personal data, in connection with their performance of such functions. These organisations are only allowed to use your personal information for the specific purpose they have been contracted for.

When sharing your data with contractors or delivery partners, a GDPR compliant contract in writing will be in place between us and them, which clearly sets out the subject matter of the processing and its duration - as well as the nature and purposes of processing, the types of personal data, any special categories of data and the obligations and rights of both parties.

### Your acceptance of this policy

By using our websites, social media pages or making a contact enquiry you consent to our collection and use of the information you provide in the way(s) set out in this policy. If you do not agree to this policy please do not use our sites, social media pages or services.

**Links to other websites**

This privacy policy applies only to Bristol After Stroke. The Bristol After Stroke website may contain links to third party websites not operated, nor controlled by us. Links to third party websites do not imply that we endorse or have reviewed their privacy policies.

**International privacy laws**

If you are visiting our website from outside the UK, please be aware that you are sending information including personal data to the UK. We will hold and process your personal data and non-personal data in accordance with privacy laws in the UK and this privacy policy.

**Retention and deletion**

We may retain your personal data for as long as you participate in our programmes or you agree to such retention. We may also retain personal data and non-personal data for an additional period as permitted or required by law.

When we delete your personal data, it may still exist on backup, archival, and in the case of media activity, on the Internet and social media channels when sharing was consented by you (e.g. online news articles).

**Personal data breaches**

A breach is considered any loss, alteration, unauthorised disclosure of, or access to, personal data.

We are committed to disclosing any personal data breaches that might adversely affect your rights and freedoms without undue delay so that you can take appropriate action. Any notifiable breaches will also be reported to the UK’s Information Commissioner’s Office within 72 hrs. This includes breaches affecting the third-party services identified in this Privacy Policy, where personal data is being held on our behalf.

Cookie Policy

Cookies are temporary files stored in web browsers by a website to help track usage and enable services that rely on a persistent identity. You can control which cookies to accept, block and remove at any time by adjusting browser settings.

We may use cookies to enhance the performance and functionality of our websites e.g. for the playback of embedded YouTube videos. Without them, certain functionality may become unavailable.

We do not use the information gathered through cookies to advertise to you.

**Changing your cookies settings**

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org/) or [www.allaboutcookies.org](http://www.allaboutcookies.org/).

Find out how to manage cookies on popular browsers:8

* [Google Chrome](https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en)
* [Microsoft Edge](https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy)
* [Mozilla Firefox](https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences)
* [Microsoft Internet Explorer](https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies)
* [Opera](https://www.opera.com/help/tutorials/security/privacy/)
* [Apple Safari](https://support.apple.com/kb/ph21411?locale=en_US)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

**Questions & access requests**

The General Data Protection Regulation (2018) gives you the right to know what personal data we hold, to have it updated if it is inaccurate, or removed entirely if you no longer consent to our use of it.

We will endeavour to respond to any such requests within one month confirming receipt and outlining what follow-up actions will be taken and when.

If you have any questions about our Cookie or Privacy Policy, you can contact us:

By email office@bristolafterstroke.org.uk

By post

Bristol Area Stroke Foundation

The Gatehouse Centre

Hareclive Rd

Bristol

BS13 9JN

**Policy Changes**

Any updates we may make to our Privacy Policy in the future will be published on this page.

Privacy policy created on 20th December 2018.