

The Happiness Horsebox CIC Privacy Policy

The Happiness Horsebox CIC respects your privacy and is committed to protecting your personal data, as set out in this Privacy Policy.

1. Introduction

This privacy policy was created on 1st January 2021. It tells you how and why The Happiness Horsebox CIC uses your personal data when you visit our website, interact with us, and book our service. It also tells you about your privacy rights and how the law protects you. It will be updated as necessary.

If you have any questions, or would like to exercise your privacy rights, please contact us by email to info@happinesshorsebox.co.uk or by post to our registered office: The Happiness Horsebox CIC , Pentland, Farley Heath, Guildford GU5 9EW.

2. The Happiness Horsebox CIC website

Our website at www.HappinessHorsebox.co.uk promotes our services and fundraises so that we can provide them at reduced cost to participants. Our website is not intended for children and we do not knowingly collect data relating to children.

The Happiness Horsebox CIC is the data controller responsible for this website and any handling of personal data carried out by or on behalf of the organisation.

3. Personal data which we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We collect a variety of information about our supporters and visitors to The Happiness Horsebox CIC website. This personal data falls into these categories:

- **Identity Data** includes title, first name, last name, username or similar identifier and an encrypted version of your login/password. If you interact with us through social media, this may also include your social media user name.
- **Contact Data** includes address, email address and telephone numbers.
- **Financial Data** includes card payment details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Profile Data** includes your username and password, purchases or orders made by you, preferences, feedback and survey responses, as well as any profile data which we have added (for example, using google analytics and profiling).
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Usage Data** includes information about how you use our website and services.
- **Tracking Data** includes information we or others collect about you from cookies and similar tracking technologies, such as web beacons, pixels, and mobile identifiers.

- **Marketing and Communications Data** includes your preferences in receiving direct marketing from us and our third parties and your communication preferences.
- We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.
- However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinion) unless it is specifically required for a booking in order to track the groups and categories of disabilities and age ranges that we are supporting

Remember, if you choose not to share personal data with us, or refuse certain contact permissions, we might not be able to contact you or provide the services you've asked for.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

1/ Direct interactions.

You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or through chat or social media. This includes personal data you provide when you:

- sign up to receive The Happiness Horsebox CIC newsletter
- make enquiries or request information be sent to you;
- create a supporter account on our website;
- book our services or make a donation;
- engage with us on social media;
- complete a survey;
- leave comments or reviews of our services

2/ Automated technologies or interactions.

As you interact with us via The Happiness Horsebox CIC website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

We may also collect Tracking Data when you use our website, or when you click on an advert (including those shown on third party websites).

3/ Third parties or publicly available sources.

We may receive personal data about you from various types of third parties, including:

- Technical Data and/or Tracking Data from analytics providers, advertising networks and search information providers;
- Contact, Financial and Transaction Data from providers of payment and fraud prevention services;
- Identity and Contact Data from data partners; and
- Data from any third parties who are permitted by law or have your permission to share your personal data with us, such as via social media or review sites We will only use your personal data when the law allows us to.

5. How we use your personal data

We need to use your data to perform a contract we are about to enter into or have entered into with you. For example, when you book our service, or become a supporter, that is a contract.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, when we carry out DBS screening as part of recruiting a coach.
- Where we need to comply with a legal or regulatory obligation. For example, keeping records of our donors for tax compliance.

We do not rely on consent as a legal basis for processing your personal data other than where the law requires it, for example sending you our newsletter. Where our legal basis is consent, you have the right to withdraw consent any time.

6. Explaining the legal basis we rely on to process personal data

We will only process your personal data where we have a legitimate interest. We may process your personal data for more than one legitimate interest depending on the specific purpose for which we are using your data. We do not carry out any automated decision making.

7. Advertising, marketing and your communications preferences

We may use your Identity, Contact, Technical, Tracking, Usage and Profile Data to form a picture of what we think you may want or need from our service, or what news may be of interest to you. This is how we decide which services and geographic areas may be relevant for you and tell you about them. This is called direct marketing.

We may carry out direct marketing by email, phone, text or post. For example, you may receive our newsletter in your inbox or a thank you letter in the post. .

On our website, we aim to make it clear what communications you will be sent, whether it's signing up to newsletter or as part of becoming a supporter or making a booking. You have a right at any time to change your mind and opt out. The easiest way to opt out is to email us at info@HappinessHorsebox.co.uk or use the unsubscribe link at the bottom of the communication.

We may also work with partners to try and promote the reach of our service and could use analytics and retargeting for this reason. We would use Tracking Data to deliver relevant online advertising, including via websites and social media. The cookies used for this purpose are often placed on our website by specialist organisations – at the moment we don't have any in place.

8. Cookies

Cookies are a tool which we (and everyone else who operates online) uses for promoting and managing their services. Generally, they are pretty clever.

Cookies help The Happiness Horsebox CIC website work better and provide lots of help in the background to make the process of being a Happiness Horsebox supporter easier. For instance being easy to log in and move from page to page, and us knowing about your booking enquiry when you contact us about it a few days later.

Other cookies collect information about how visitors use our website for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information these cookies collect is aggregated and just used to improve how our website at www.HappinessHorsebox.co.uk works.

There are also cookies that allow the website to remember choices you make (such as your user name or the region you are in) and provide enhanced, more personal features, such as emailing you a newsletter.

In the future, if we need to generate income from advertising, we may have cookies that collect information about your browsing habits in order to make advertising delivered to you more relevant to you and your interests. They are usually placed by advertising networks with our permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

When you use our website, your device or browser may be sent cookies from third parties, for example when using embedded content and social network links. It's important that you understand that we have no access to or control over cookies used by these companies or third-party websites. You can check the third-party websites for more information about their cookies and how to manage them.

Our service and website has just been launched and is still developing. You can ask us for up to date information about the cookies we use including who they belong to, their ID and why they are used by emailing us at info@HappinessHorsebox.co.uk

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly.

9. Other disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out in this privacy policy. We may also share your personal data if the law otherwise allows it.

We may share personal data with the following categories third parties:

- Suppliers and service providers (such as technology service providers, payment processing and fraud prevention providers and postal services);
- auditors and professional advisers like bankers, lawyers, accountants and insurers; and
- government, regulators and law enforcement.

In the future, we may also share data with third parties to whom we may choose to sell, transfer, or merge parts of our service or our assets. Alternatively, we may seek to work in partnership with other organisations or merge with them. If such a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

Third parties are covered by the same legislation and have to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

10. Payment information

The Happiness Horsebox CIC uses third party payment processors such as Stripe and GoCardless to process payments made for services or as donations via the website. All online payments will be conducted in accordance with Payment Card Industry (PCI) data security standards and your billing information (which is only used by these payment processors for the purpose of performing fraud protection) is encrypted before being communicated to them.

If we use PayPal we only store the tokens required to identify the transaction with PayPal, issue refunds and identify transactions made using PayPal.

Your credit card details are communicated directly from your browser to these payment processors - The Happiness Horsebox CIC never sees your full Permanent Account Number (PAN). This means that the payment form is either off-site or displayed in a frame on the payment page.

11. International transfers

We have no need to transfer your personal data out of the UK, so UK legislation applies.

12. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

13. Third-party links

Our website may include links to third-party websites, plug-ins and applications (for example, maps or links to other sites). Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

We do not control these third-party websites and are not responsible for their privacy statements.

14. Data retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they stop being customers for tax purposes.

In some circumstances you can ask us to delete your data; see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

15. Your legal rights

If the General Data Protection Regulation (GDPR) applies to you because you are in the UK or European Union, you have rights under data protection laws in relation to your personal data:

- The right to be informed – that’s an obligation on us to inform you how we use your personal data (and that’s what we’re doing that in this privacy policy);
- The right of access – that’s a right to make what’s known as a ‘data subject access request’ for copy of the personal data we hold about you;
- The right to rectification – that’s a right to make us correct personal data about you that may be incomplete or inaccurate;
- The right to erasure – that’s also known as the ‘right to be forgotten’ where in certain circumstances you can ask us to delete the personal data we have about you (unless there’s an overriding legal reason we need to keep it);
- The right to restrict processing – that’s a right for you in certain circumstances to ask us to suspend processing personal data;
- The right to data portability – that’s a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file);
- The right to object – that’s a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing); and
- Rights in relation to automated decision making and profiling – that’s a right you have for us to be transparent about any profiling we do, or any automated decision making.

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them on the UK [Information Commissioner’s Office website](#).

If you wish to exercise any of the rights set out above, please contact us by email.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details in How to contact THE HAPPINESS HORSEBOX CIC about privacy below.

You have the right to make a complaint at any time to the Information Commissioner's Office ("ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

16. How to contact The Happiness Horsebox CIC about privacy

If you have any questions about this privacy policy, or would like to exercise any of your rights, please email or write to us at the address in the **Introduction** of this policy.

17. Changes to this privacy policy

Following Brexit, the General Data Protection Regulations may change. We will follow ICO guidance and will update this policy accordingly.

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