Data Protection and Privacy Policy

Circle of Life Rediscovery CIC (CLR) is registered with the Information Commissioner's Office (ICO). We are committed to protecting your privacy and handling your personal information fairly, lawfully, and transparently in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

What personal data we collect

We collect personal data that you provide to us, which may include:

- Contact details (name, address, phone number, email address).
- Date of birth, health or dietary information (where relevant to participation in our programmes).
- Payment details (where necessary for training, courses or events).
- Images or video, only where you have given explicit consent.
- For staff and volunteers: information needed for safer recruitment and safeguarding (e.g. NI number, references, DBS checks).

How we use your personal data

We use your data to:

- Deliver our programmes, training and events.
- Manage participation safely, including safeguarding and health considerations.
- Contact you with information about our work, events, and training (only where you have consented to receive communications, or where we rely on legitimate interests).
- Fulfil our legal and regulatory obligations, including safeguarding duties.

Legal bases for processing

We rely on the following legal bases:

- **Consent** – e.g. for newsletters, marketing communications, or the use of photographs and video. You can withdraw consent at any time.

- **Legitimate interests** – e.g. to run our events safely, manage bookings, or communicate with you in ways you would reasonably expect.

- **Legal obligation** – e.g. where we are required to share safeguarding concerns with statutory authorities.

- **Contract** – e.g. where you have booked onto a paid training course and we need your details to deliver the service.

Sharing your data

We will never sell or trade your personal information. We may share your data only with trusted service providers who support our operations (such as email or IT providers, event booking platforms, payment processors, or insurers). These providers only process data on our instructions and are contractually required to protect it.

Where information is transferred outside the UK (for example, where servers are based overseas), we ensure that appropriate safeguards are in place, in line with UK GDPR.

Storing your data

- Personal information is stored securely on encrypted systems with access restricted to authorised personnel only.

- Paper records are kept locked and destroyed securely when no longer needed.

- We retain personal data only for as long as necessary for the purposes collected. For example:

    - Safeguarding and incident records: 25 years.

    - Training and booking records: 7 years.

    - Mailing list data: until you unsubscribe.

Your rights

You have the following rights under the UK GDPR:

- To access the personal data we hold about you.

- To have inaccurate data corrected.

- To request erasure of your data (“the right to be forgotten”).

- To restrict or object to processing in certain circumstances.

- To request transfer of your data to another provider (“data portability”).
- To withdraw your consent at any time.
- To lodge a complaint with the **Information Commissioner’s Office (ICO)** if you are unhappy with how we handle your data.

For more information on your rights, visit the ICO website: https://ico.org.uk.

Contact us

If you have questions about this policy, or wish to exercise your data rights, please contact us at:

info@circleofliferediscovery.com

Updated 1-10-25 – next review October 2027