



Spark2Life Website Privacy Notice

Spark2Life (“we”, “our”, “us”) is committed to protecting and respecting your privacy. This notice sets out how we collect, use, and protect your personal data when you use our website www.spark2life.co.uk, engage with us online, or interact with us in any way through our website.

We are a registered charity in England and Wales, and a company limited by guarantee. Our registered office is:

The Outset Centre, 2A Grange Road, E17 8AH

Registered Charity Number: 1121557

Company Number: 05895562

If you have any questions about this policy or how we handle your data, please contact:

Data Protection Officer

Email: dp@spark2life.co.uk

Address: The Outset Centre, 2A Grange Road, E17 8AH

How We Use Your Personal Data

We collect and process personal data for the following purposes and on the basis of the following legal bases:

Information You Provide Directly:

Personal Data we collect:	How we use your personal data and our lawful basis:
<p>Event or Webinar Registration</p> <p>You give us personal data about you when you register for any of our events or webinars. This information may include your name, email address, telephone number, company, job title, details of the relevant event or webinar, your marketing preferences and attendance record. Where payment is required for an event or webinar, you may also provide us with payment details (bank card details and billing address).</p>	<p>Legitimate Interests</p> <p>We use your personal data to complete and fulfil your registration for any of our events or webinars, including sending you a confirmation message so you know your registration is successful, sending you updates on the event or webinar you have registered for and providing you with access to your registered event or webinar.</p>
<p>Donations</p> <p>You give us personal data about you when you donate to us or any of our initiatives. This information may include your name, email address, telephone number, billing address, payment details, donation details (including amount, recurrence, type of donation, reason for donation and gift aid claimed) and your marketing preferences.</p>	<p>Legitimate Interests</p> <p>We use your personal data to administer any oneoff or on-going donations you make and to claim any Gift Aid.</p> <p>Legal Obligation</p> <p>Where appropriate, we use your personal data to carry out due diligence checks (which may include background checks) if you are a donor or anyone planning on making a donation or gift, before we can accept it.</p>

Marketing Communications and Updates (Including for Fundraising)

You give us personal data about you when you subscribe to receive marketing communications and updates from us or we are otherwise legally allowed to send you such marketing communications. This information may include your name, telephone number, email address and your marketing preferences (i.e. the marketing and updates you want to receive and how you want to receive them).

Consent

- We use your personal data to contact you with marketing communications (and to manage our marketing processes) where you have provided your consent to receive these communications. We will only do this in line with your marketing preferences. You can optout of receiving these communications at any time by selecting the unsubscribe link in any email we send you, or by contacting us.
- We perform segmentation analysis of your personal data for the purposes of determining what content is best suited to send to you, and to ensure we are sending our marketing communications to supporters who will be most interested or likely to respond. We do this, for example, by analysing factors about you such as how you have signed up to receive marketing communications from us, your group, your location (e.g. post code) and your marketing preferences. Please note that we will cease to do any segmentation where you opt-out of receiving these communications at any time by selecting the unsubscribe link in any email we send you, or by contacting us.

Legitimate Interests

We use your personal data to contact you with marketing communications (and to manage our marketing processes) where we are legally allowed to do so without having received your consent. For example, in some circumstances, we are allowed to contact you with marketing communications without receiving prior consent. You can opt-out of receiving these communications at any time by selecting the unsubscribe link in any email we send you, or by contacting us.

Market Research, Surveys, Reviews and Testimonials

You give us personal data about you when you participate in our market research, complete any of our surveys, or when you write a review/testimonial about us. This information may include your name, contact information, job role, your market research/survey responses, and the content of your review/testimonial.

Legitimate Interests

- We use your personal data to register you for our market research and surveys, and to analyse the responses you have provided.
- We use your personal data to publish your reviews and testimonials on our website and/or marketing materials.

Consent

We use your personal data to publish your reviews and testimonials on our website and/or marketing materials where you are identifiable,

Customers/Suppliers/Partners and Representatives

You give us personal data about you when you enter into a supplier/partnership agreement or relationship with us or are a representative of a supplier/partner. This information may include your name, company, job title, email address, phone number and the content of our communications with you

Legitimate Interests

We use your personal data to contact you and to manage our relationship with you and/or your company where you are a supplier/partner or the representative of a supplier/partner with whom we have a business relationship.

Contacting Us

You give us personal data about you when you contact us or otherwise interact with us, including via the contact us web forms on our website, phone, email, post or social media. This information may include your name, company, school, job title, contact preference (email address/phone number), areas of interest and what you have contacted us about.

Legitimate Interests

We use your personal data to respond to your enquiries and fulfil your requests, for example, when you send us questions, suggestions, compliments, or complaints, or when you request information about our services and initiatives. We may also take this information into account when improving our websites, initiatives, and services generally.

Visitors

You give us personal data about you when you visit any of our premises and provide attendance information. This information may include your name, your company, job title, school, who you are visiting, and the date and time of your visit.

Legitimate Interests

We use your personal data to facilitate your access to our premises, to ensure security of our premises and for our record keeping purposes.

Training Courses:

You give us personal data about you when you apply for any of our training courses and when you are successfully enrolled and participating in our training courses. This information may include your application form, additional skills and experiences, references, certification history (including counselling certifications and educational degrees), payment details, safeguarding information, details of any reasonable adjustments you require, and any additional information you provide to us as part of your application and your progression throughout the course once enrolled (including attendance, submissions, contributions, assessment reports and feedback on your performance). If your training course includes access to our online learning platform, we collect information of your platform account details and details of your interaction with our online learning platform, including your courses, comments and responses to polls and quizzes. Please note that all other participants in your cohort will be able to see comments you post on our online learning platform.

Consent

We use your personal data (in the form of comments you have posted on our online learning platforms) to illustrate the work we do for promotional and fundraising purposes (e.g. by publishing on our website/social media or in our fundraising reports), in a manner which reveals your identifying information.

Performance of Contract:

- We use your personal data to consider your application and assess your suitability for our training courses. Where you meet our suitability requirements, we use your personal data to enrol you on our training courses and provide you with access to the courses and materials.
- We use your personal data to contact you with service information concerning the course you have enrolled on and any relevant course materials.

Counsellor and Volunteer Placements

You give us personal data about you when you agree to work with us as a counsellor on placement. This information includes your name, address, phone number, email address, disability information, recruitment information (current salary, notice period, education/employment history and professional qualifications), sexual orientation, ethnic origin, religious beliefs, DBS check details and details of your placements and performance as a volunteer counsellor. Where you have applied for a role that involves working with children, we will ask you to declare all cautions, bindovers, pending prosecutions, and spent and unspent convictions.

Consent:

We use the sensitive personal data you provide to understand the makeup of our counsellors on placement programme, to monitor diversity on the programme and to ensure the programme is properly tailored to support you.

Legitimate Interests:

- We use your personal data to determine your suitability to be a volunteer counsellor and onboard you as a volunteer counsellor.
- We use your personal data to administer and manage our relationship with you, including keeping records and communicating with you.
- We use your personal data to determine your suitability for a placement, share your information with relevant schools for the purposes of a placement and report on your performance whilst on placement.

Legal Obligation:

- We use your personal data to comply with our legal obligation to make reasonable adjustments/accommodations to our counsellors on placement application process and programme, where you have informed us of any disabilities or access requirements.
- We process your personal data to comply with our legal obligation to carry out a full DBS/PVG clearance (criminal record disclosure checks) before you start working at a Spark2Life's sites.

Information obtained from Third Parties

Personal Data we collect	How we use your personal data and our lawful basis
<p>Event Organisers</p> <p>We may be provided with your personal data by independent event organisers (for example, the London Marathon or fundraising sites like Just Giving or Virgin Money Giving) where you have indicated that you wish to support Spark2Life and have given permission for your information to be passed to us. This information may include your name, address, phone number, email address, fundraising page and details of the relevant event you are participating in</p>	<p>Legitimate Interests</p> <ul style="list-style-type: none">• We use your personal data to ensure you are properly registered as a supporter when participating in events run by our partner event organisers, and to keep track of your progress.• We use your personal data to communicate with you about the specific fundraising event/activity you have chosen to participate in for Spark2Life.
<p>High Value Event Planning</p> <p>Where you are due to meet with our leadership or attend an event that we may be hosting, we may collect personal data about you from publicly available sources (e.g. google) to profile you.</p>	<p>Legitimate Interests</p> <p>We use your personal data to produce short biographies about you, so we can understand more about those we engage with, and their interests or connection to us.</p>
<p>Personal data provided by your affiliated company</p> <p>Where you are an employee or representative of any of the company's we have a relationship with (e.g., a customer, supplier, or partner of Spark2Life), we may be provided with your personal data by your affiliated company during the course of this relationship. This information may include your name, contact details, job title and company.</p>	<p>Legitimate Interests</p> <p>We use your personal data strictly in the context of the business purposes with your affiliated company.</p>
<p>Referrals</p> <p>We may be provided with personal data about you, where you have been referred to us by another party. This could be for a number of reasons, including, as a potential donor, volunteer counsellor or as the representative of a school interested in partnering with Spark2Life.</p>	<p>Legitimate Interests</p> <p>We use your personal data to determine your suitability for any of the purposes for which you have been referred, and to contact you in relation to such purposes.</p>

Information we collect automatically

Personal Data we collect	How we use your personal data and our lawful basis
<p>Visiting our website</p> <p>We collect personal data about you automatically when you visit and interact with our website. Our servers keep an activity log unique to you that collects certain administrative and traffic information including your device details, device location, source IP address, time of access, date of access, web page(s) visited, language use, software crash reports and type of browser used.</p>	<p>Legitimate Interests</p> <p>We use your personal data to make sure you are able to use our website, to monitor how our website is being used, to help us discover and fix any problems with our website and to determine what country you are in when you use our website</p>
<p>Cookies (and Similar Technologies)</p> <p>We collect personal data about you, by automated means, through cookies and similar technologies (e.g., web beacons, pixel tags, etc.) placed on your device when you visit and use any of our websites. Cookies and similar technologies are simple pieces of computer code which are designed to collect information from the device you use to access our website. The information collected may include a user ID assigned to you, your IP address, the content you have interacted with, duration of each visit and error messages you encounter. Please see our Cookie Policy for more information on what cookies (and other similar technologies) are and how we use them.</p>	<p>Consent</p> <ul style="list-style-type: none">• We use your personal data to carry out web analytics on our website (e.g., to monitor the number of your visits to our website and the actions you take on our website for analytical purposes).• We use your personal data to ensure our services work as intended on your device and are able to provide the content or perform the actions you request while using our services.• We use your personal data to enhance the operation of our website, improve our marketing and promotional efforts, statistically analyse site use, improve our product and service offerings, and customize our website's content, layout, and services. <p>Legitimate Interests</p> <ul style="list-style-type: none">• We use your personal data as strictly necessary to ensure you are able to use our website, to ensure security of our website and to record your cookie consent preferences.

Internal Organisation purposes

Personal Data we collect:	How we use your personal data and our lawful basis:
<p>Ethical Screening</p> <p>As a registered charity, we are subject to a number of obligations and standards, which we take seriously. The public naturally expect charities to operate in an ethical manner and this is integral to developing high levels of trust and demonstrating our integrity. Our ethical screening processes may apply to any of the above personal data we collect about you.</p>	<p>Legitimate Interests</p> <p>We use personal data to ethically screen our supporters, to minimise the risk of creating an association with an individual or group that conflicts with the standards we have set out in our overarching ethical policy.</p>
<p>Fraud and Security Monitoring</p> <p>Our fraud and security monitoring processes may apply to any of the above personal data we collect about you</p>	<p>Legitimate Interests</p> <p>We use your personal data to carry out fraud and security monitoring within our business (e.g., to detect and prevent cyberattacks or attempts to commit identity theft.)</p>
<p>Business Administration</p> <p>Our processes for ensuring the proper day to day running of our business may apply to any of the above personal data we collect about you.</p>	<p>Legitimate Interests</p> <p>We use your personal data as necessary to operate our business efficiently.</p>

Legal Claims and Compliance with Legal Obligations

Our processes for complying with our legal obligations and protecting our rights under the law may apply to any of the personal data we collect about you listed in this Policy.

Legitimate Interests

We use your personal data to effectively defend or bring claims to protect our legal rights and interests, to respond to investigations from regulators or law enforcement, and to audit our internal processes for compliance with legal and contractual requirements.

Legal Obligation

We use your personal data to comply with applicable laws, binding legal guidance imposed on us as a charity (including in relation to due diligence and monitoring), lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities, and audit our internal processes for compliance with legal requirements.

Donor analysis

Prospective donors may be referred to us by internal stakeholders and individuals who are warm to Spark2Life. We carry out analysis on prospective high value donors by conducting research via information from resources available in the public domain. Information that may be collected by Spark2Life can include financial, business, philanthropic, networks, biographical and demographic information sourced from publicly available data such as Companies House (or other business related resources such as Boardex/Wealth, Factiva), the Charity Commission (or other grant related databases such as Factory Phi), company websites, LinkedIn profiles and press sources. This work is undertaken by Spark2Life directly and not by third parties. All information is processed securely and in line with other data collection processes. Another method of analysis is by research of our supporter database to find supporters who have made large donations to Spark2Life (usually supporters who have made single donations of approximately £1000 or more). We may then conduct background research on these individuals from publicly available sources in order to learn more about them and ensure we contact them in an appropriate manner.

Legitimate Interests

We use your data to understand the giving patterns of supporters and the propensity of our supporters to take action in supporting our causes. This analysis helps us to understand our high value donor audience more fully, tailor our communications and approach appropriately and improve the quality of our supporters' experience with us.

Consent

Spark2Life will always seek to present our privacy policy to donors and prospective donors as soon as we are able to. Data regarding prospective high value donors we decide to contact is kept for the duration of that individual's relationship with Spark2Life in accordance with our usual retention schedule. Topline information on prospective donors who we are unable to contact will be securely removed from our database and records in line with our retention schedule.

Who We Share Your Personal Data With

We only share your personal data when necessary:

- With trusted service providers
- With law enforcement or regulators when required
- With schools or partners
- With event organisers or sponsors
- Internally, for the management of our services

We may also disclose personal data: (1) if we are required or permitted to do so by law or legal process (such as a court order or subpoena); (2) to establish, exercise, defend or protect our legal rights; (3) to respond to or comply with a judicial proceeding, court order, or request by a government or regulatory agency, such as to a national security body, law enforcement body, tax authority or data protection supervisory authority; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent.

Unfortunately, the transmission of information and data via the internet is not completely secure. Although we make an effort to protect your personal data, we cannot guarantee the security of any information or data transmitted to or through our website. Any transmission of information or data by you to or through our website is at your sole risk.

Data Retention

We retain personal data only for as long as necessary, based on:

- Legal requirements
- Contractual obligations
- Operational needs
- Consent withdrawal

International Data Transfers

We primarily store data in the UK. If data is transferred outside this area, we ensure appropriate safeguards are in place, such as:

- Standard Contractual Clauses (SCCs)
- Transfers to countries with adequacy decisions

Your Rights

You may have the following rights under the UK GDPR:

- Access your data. You have the right to ask for a copy of the personal data that we hold and process about you free of charge, however we may charge a 'reasonable fee', if we think that your request is excessive, to help us cover the costs of locating the information you have requested.
- Correct inaccurate data. You may notify us of changes to your personal data if the information we hold and process about you is inaccurate or it needs to be updated.
- Request erasure. If you think that we should not be holding or processing your personal data any more, you may request that we delete it. Please note that the right to deletion is not absolute and it may not always be possible to delete personal data on request, including where the personal data must be retained to comply with a legal obligation. In addition, deletion of personal data may result in the inability for us to fulfil the purposes described in this notice.
- Restrict processing. You may request that we stop processing your personal data (other than storing it), if: (i) you contest the accuracy of it (until the accuracy is verified); (ii) you believe the processing is against the law; (iii) you believe that we no longer need your personal data for the purposes for which it was collected, but you still need your personal data to establish or defend a legal claim; or (iv) you object to the processing, and we are verifying whether our legitimate grounds to process your personal data override your own rights.
- Data portability. If you wish to transfer the personal data that we hold and process about you on the legal ground of contractual necessity to another organisation (and certain conditions are satisfied), you may ask us to do so, and we will send it directly if we have the technical means.
- Object to processing. You have the right to object to processing, including: (i) for direct marketing; (ii) for research or statistical purposes; or (iii) where processing is based on legitimate interests.
- Withdraw consent. If you previously gave us, and we rely on, your consent (by a clear affirmative action) to allow us to process your personal data, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent.

To exercise your rights, contact us at dp@spark2life.co.uk. 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 will not discriminate against you for exercising your rights under applicable privacy laws.

Should you wish to lodge a complaint with regards to how your personal data has been processed by us, please contact your local supervisory authority. In the UK, this is the Information Commissioner's Office – <https://ico.org.uk/global/contact-us>.

Updates to This Notice

We may amend or update this notice periodically, in our sole discretion, without notice. If we decide to change this notice, we will post those changes on our website so that you remain aware of what personal data we collect, how we use it and under what circumstances, if any, we disclose it. Accordingly, you should review this notice regularly. Your continued access or use of this website following the posting of changes to this notice constitutes your acknowledgment of such revisions, changes and/or amendments.

Last updated: 3/6/2025