

PRIVACY POLICY

BuDS is committed to ensuring that your privacy is protected. We may ask you to provide personal information when using this Website, <https://buds.org.uk/> (the “**Website**”), or you otherwise use any of the services provided through it. You can be assured that it will only be used in accordance with this privacy policy and applicable data protection laws. This privacy policy sets out how BuDS collects, uses, share and protects any information that you give BuDS when you use this Website (whether you do so as a visitor to or user of the BuDS platform, a BuDS shop customer, or a BuDS member). If you are a BuDS member, or applying to be a BuDS member, certain parts of this privacy policy may be particularly relevant to you. This is clearly indicated in this policy. Please take time to review this privacy policy carefully and if you have any questions, contact us at info@buds.org.uk. This privacy policy was last amended on 18th May 2021.

It is important that you read this privacy policy together with any other privacy notice on our website from time to time so that you are fully aware of how and why we are using your data.

This website is not intended for children and we do not knowingly collect data relating to children.

CONTROLLER

BuDS is the controller and responsible for your personal data (collectively referred to as, “we”, “us” or “our” in this privacy policy).

We have appointed a data protection lead (DPL) 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 us info@buds.org.uk

CONTACT DETAILS

Our full details are:

Full name of legal entity: Buckinghamshire Disability Services, a charity with registered number 1102511. BuDS is registered, and operates, in the United Kingdom.

Postal address: BuDS, c/o B P Collins LLP, Collins House, 20 Station Road, Gerrards Cross, Buckinghamshire, SL9 8EL

You can also contact us at info@buds.org.uk

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 (<https://ico.org.uk>). In the UK, please read: <https://ico.org.uk/your-data-matters/raising-concerns/> for details of how to do this. We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please do contact us in the first instance.

CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

We may need to update this Policy at any time and without notice and where we do this we will notify you, for example, by emailing all of our customers.

It is important that the personal data we hold about you is accurate and up to date. Please keep us informed if your personal data changes during your relationship with us and periodically review the details in your account settings on our Website.

WHAT THIS PRIVACY POLICY COVERS

This privacy policy applies only to your use of the Website and applicable associated services.

THIRD PARTY LINKS

This Website may include links to third-party Websites, plug-ins and applications. 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. When you leave our Website, we encourage you to read the privacy policy of every Website you visit.

INFORMATION WE COLLECT

We may collect the following information from you:

- Personal information: including your full name.
- Contact information: including your billing address, delivery address, email address and telephone numbers;
- Financial information: including bank account and payment card details (if you sell your products services in the Website shop, or deliver workshops as one of BuDS's experts);
- Transaction information: including details about payments to and from you and other details of products and services you may have purchased from us.
- Technical information: including your 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 the Website.
- Profile information: including your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses. This may also include any information we collect about you when we carry out an assessment for you to become a 'Platinum Member';
- Usage information including information about how you use the Website and any services made available to you via the Website.
- Marketing and Communications information includes your preferences in receiving marketing from us and our third parties and your communication preferences.

HOW WE USE INFORMATION WE COLLECT

We require this information to understand your needs and provide you with a better service, and in particular for the following reasons:

- To provide our services to you
- To fulfil an order made by you
- Internal record keeping
- to improve our products and services

We may periodically send promotional emails about new products, special offers or other information which we may find interesting using the email address which you have provided. If you do not wish to continue to receive such emails from us, please notify us at info@buds.org.uk

- From time to time, we may also use your information to contact you for market research purposes. We may contact you by email, phone or post
- We may use the information to customise the Website according to your interests

If at any time after you have submitted your information to us, you wish us to stop using your information to contact you for marketing or market research purposes, please email info@buds.org.uk.

LEGAL BASES FOR PROCESSING

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- 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.
- Where we need to comply with a legal obligation.

See the section below entitled 'Lawful Bases for Processing' to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences OR by following the opt-out links on any marketing message sent to you OR by contacting us at any time.

Where you opt out of receiving these marketing messages, you may continue to receive 'service' messages from us, for example relating to your purchase of a particular product or service.

SHARING YOUR INFORMATION

In order to provide you with the services made available to you through the Website, we may share your personal information with certain third party service providers, who may process your personal information on our behalf through provision of that service.

These service providers may include internet service and platform providers, payment processing providers and those organisations we engage to help us send communications to you.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law and they may only use your data for the purposes we specify in our contract with them. We will always work with them to protect your privacy.

If you are a BuDS member, we may also share your information with:

- our strategic partners, to enable you access the benefits they provide to our members or users;
- our strategic partners, for the purposes of recording any information collected during the course of an assessment for your acceptance as a BuDS 'Platinum Member'; and/or
- specialist advisers in order to respond to a specific query that you raise when you contact us through the BuDS helpdesk;

We may also share your information with regulators, government agents and other authorities to meet our legal and regulatory obligations.

YOUR LEGAL RIGHTS

As the data subject, the individual whose information we hold has the following rights under the General Data Protection Regulation.

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

For more information in relation to these rights, please visit the relevant page of the [Information Commissioner Website](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of your 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.

WHAT WE MAY NEED FROM YOU

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.

TIME LIMIT TO RESPOND

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.

SECURITY AND STORAGE OF INFORMATION

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure we have put in place suitable physical, technical, organisational and managerial procedures to safeguard and secure the information we collect online.

You acknowledge that the Internet is not a completely secure medium for communication and, accordingly, we cannot guarantee the security of any information you send to us (or we send to you) via the Internet. We are not responsible for any damages which you, or others, may suffer as a result of the loss of confidentiality of such information

TRANSFERS OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

We may use service providers outside of the EEA to help us provide our Website and services to you and this means that we may transfer your data to service providers such as payment providers for the purposes of providing our services to you.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy decisions](#).
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain 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. For example, details of your orders will be kept for as long as we need to retain that data to comply with our legal and regulatory requirements. This is generally 6 years unless the law prescribes a longer period.

In some circumstances you can ask us to delete your data: see 'Your Legal Rights' above 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.

GLOSSARY

LAWFUL BASES FOR PROCESSING

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Approved: June 2022

Review: June 2024