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1. HOW WE USE YOUR PERSONAL DATA

We collect personal data directly from you, from third parties and automatically when you use our website. We only use personal data where we have a lawful basis. Depending on the purpose, we may rely on:

- performance of a contract, including taking steps at your request before entering into a contract;
- compliance with a legal obligation;
- your consent; or
- our legitimate interests, or those of a third party, where those interests are not overridden by your interests, rights and freedoms.

If you do not provide personal data that is needed for a service, contract or legal requirement, we may not be able to provide the relevant service, or it may be delayed.

For more information on our lawful bases for processing your personal data, please see the table below, where we have included each lawful basis as a subheading.

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Of Wales

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Registered Charity in England and Wales (1040756) and in Scotland (SC038649)
Registered Company in England and Wales (02876150)

Registered with FUNDRAISING REGULATOR

Information you give us

Personal data we collect	How we use your personal data and our lawful basis
Account Registration You give us personal data about you when you create any accounts on our website and by using these accounts. This information may include your name, email address, phone number, school name and address, job role, marketing preferences and actions you take on your account.	*Legitimate Interests* • We use your personal data to register and maintain your accounts on our website, (including providing you with related user support to help you resolve any issues you have with your accounts). • We use your personal data to send you important information you need to know relating to how our services work, including information on changes to our terms, conditions, and policies.
Event or Webinar Registration 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 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).	*Legitimate Interests* 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.
Donations 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.	*Legitimate Interests* We use your personal data to administer any one-off or on-going donations you make and to claim any Gift Aid. Legal Obligation 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.

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Marketing Communications and Updates (Including Fundraising) You give us personal data about you when you subscribe to receive marketing communications and updates from us, make a donation, register for an event, enquire about our services, training or fundraising activities, volunteer, download resources, or otherwise express an interest in or provide support for Place2Be's charitable purposes, or we are otherwise legally allowed to send you such marketing communications. This information may include your name, telephone number, email address, information about your relationship and interactions with Place2Be, and your communication and marketing preferences.	*Consent* Where consent is required by Law, we will use personal data to send you marketing communications (and to manage our marketing processes) only where you have given us your consent to do so. We will only send those communications in accordance with your marketing preferences you have provided to us. ***You may withdraw your consent and copt out of receiving marketing communications at any time by selecting the unsubscribe link in any email we send you, or by contacting us.*** *Withdrawing your consent will not affect the lawfulness of any processing carried out before you withdrew your consent.* *Legitimate Interests and Charitable Purpose Soft Opt-In* • Where permitted by law, we may send you electronic marketing communications without obtaining your prior consent where this is permitted by law under the charitable purposes soft opt-in. This may apply where you expressed interest in, offered support for or provided support for Place2Be's charitable purposes; we obtained your contact details directly from you; you were given a clear opportunity to opt out when your details were collected; and you have not subsequently opted out. • Where we rely on this route, our UK GDPR lawful basis will normally be legitimate interests. We consider the impact on your rights and freedoms and seek to ensure that communications are relevant, proportionate and consistent with your reasonable expectations. The charitable purposes soft opt-in does not automatically apply to personal data obtained from third parties. ***Segmentation and Personalisation*** • We may analyse certain personal data to help us understand which information likely to be most relevant to you and to tailor our marketing and fundraising communications appropriately. We do this, , by analysing factors about you such as your relationship with Place2Be, how you have engaged

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	with our services, activities or fundraising initiatives, how you have signed up to receive marketing communications from us, your group, your location (e.g. post code) and your communication preferences. • This analysis may be used to tailor marketing and fundraising communications where permitted by law. If you **opt out of marketing communications**, we will stop using your personal data for direct marketing and related marketing segmentation. We may continue to process your personal data for other purposes described in this Policy where we have an appropriate lawful basis. • We do not use segmentation to make decisions about you based solely on automated processing where those decisions would have a legal or similarly significant effect on you. ***Your marketing choices*** • You have an absolute right to object to direct marketing. If you opt out, we will stop using your personal data for direct marketing and related segmentation or personalisation. We may still contact you about non-marketing matters, such as administering a donation, booking, account, course or other relationship**.** Where we rely on the charitable purpose's soft opt-in, our lawful basis for processing your personal data under UK GDPR will normally be legitimate interests.
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 (where you are not identifiable from the review / testimonial).

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	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.	*Performance of a contact* We may process personal data where it is necessary to enter into or perform a contract with you or your organization. This includes activities such as managing orders, delivering products or services, handling payments, and fulfilling our contractual obligations.
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 information. This information may include your name, your company, job title, school, who you are visiting, and the date and time of your visit. [We may also capture CCTV footage of you when you visit our premises].	*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.

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Training Courses You give us personal data about 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. *Legitimate Interests* • We use your personal data to analyse your comments and responses to polls, quizzes, and any other interactive elements of our online learning platform, for research and evaluation purposes. The output of this information will be pseudonymized to reduce any chance of identifying you. • 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 does not reveal your identifying information. *Legal Obligation* • We use your personal data to comply with our legal obligation to make reasonable adjustments/accommodations to our application process and training courses, where you have informed us of any disabilities or access requirements.

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Counsellors on Placement 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

Information provided by third parties

Personal data we collect	**How we use your personal data and our lawful basis**
Event Organisers 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 Place2Be and	*Legitimate Interests* • We use your personal data to ensure you are properly registered as a Place2be supporter when participating in events run by our partner event organisers, and to keep track of your progress.

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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.	• We use your personal data to communicate with you about the specific fundraising event/activity you have chosen to participate in for Place2be.
High Value Event Planning 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 gather information about you, your background, qualifications and interests.	*Legitimate Interests* 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.
Personal data provided by your affiliated company 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 Place2Be), 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.	*Legitimate Interests* We use your personal data strictly in the context of business purposes with your affiliated company.
Referrals 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 Place2Be.	*Legitimate Interests* 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.
Parent Partnership and Parent Support Referrals We may receive personal data about parents, carers and other family members from schools, educational settings or partner organisations where they have referred, recommended or facilitated access to Place2Be's parent support services, including Parent Partnership services. This information may include names, contact details, school details and information necessary to arrange or provide support.	*Legitimate Interests* We use this personal data to contact parents and carers, arrange and deliver parent support services, manage referrals, provide appropriate support and maintain records relating to the support provided. Some Parent Partnership services are designed to be provided anonymously and, where this is the case, Place2Be will seek to minimise the personal data recorded about individuals. However, where concerns relating to the safety or wellbeing of a child or adult are identified, or where we are otherwise required to do so by law, we may record, use and share relevant information in accordance with our safeguarding, legal and regulatory obligations.

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Information we collect automatically

Personal data we collect	How we use your personal data and our lawful basis
Visiting our website 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	*Legitimate Interests* 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.
Images, Video and Audio Recordings We may collect and use photographs, video footage, audio recordings, interviews and other related media ("Media Content") as part of our activities. This may include capturing Media Content for documentation, marketing, fundraising, training, promotional purposes, or illustrating our work. Media Content may be used on our website, social media channels, printed and digital publications, fundraising communications, presentations, media coverage, or other promotional materials. Where individuals are to be identified by name, this will be stated clearly in the consent form at the time of collection. We store all Media Content securely on password-protected systems with restricted access. We will keep Media Content only for as long as necessary to fulfil the purposes for which it was collected, including for future promotional or fundraising activities where consent has been provided. Where removal of previously published material is not practical (for example, on printed materials or existing social media posts), such content may continue to appear. Individuals aged 16 and over may provide their own consent; consent for individuals under 16 must be provided by a parent or carer.	*Consent* **Our legal basis for collecting**, using, and retaining Media Content is your consent. We will only photograph, interview, film, or record individuals where we have obtained clear and informed consent in advance, through a written consent form completed prior to the activity. The lawful basis for this processing is consent (Article 6(1)(a) UK GDPR). Where Media Content is captured in connection with Place2Be's therapeutic or mental health programmes, and where that content could reveal or imply information about a person's physical or mental health, we will additionally rely on explicit consent as our basis for processing special category data (Article 9(2)(a) UK GDPR). In such cases, the consent form will clearly identify this and the specific nature of the data being recorded. Where Media Content features children, it will only be used in a manner consistent with Place2Be's safeguarding policy. We will not use such content in any way that identifies a child's school, therapeutic context, or mental health needs. You may **withdraw your consent** at any time by contacting us using the details provided in this Privacy Policy. If you withdraw consent, we will stop using your Media Content in any new materials and will take reasonable steps to delete or anonymise the content. Previously published materials may continue to appear where removal is not practical.

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Internal organisational purposes

Personal data we collect	How we use your personal data and our lawful basis
Ethical Screening 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.	*Legitimate Interests* We use personal data to carry out ethical screening and due diligence of supporters, donors, partners and other relationships where appropriate. This helps us assess whether an association is consistent with Place2Be's values, charitable purposes, and risk management requirements, and supports informed decision-making in relation to fundraising, partnerships and reputation management.
Fraud and Security Monitoring Our fraud and security monitoring processes may apply to any of the above personal data we collect about you.	*Legitimate Interests* 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.)
Business Administration 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.	*Legitimate Interests* We use your personal data as necessary to operate our business efficiently.
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 Place2Be. 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 Place2Be can include financial, business, philanthropic, networks,	*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.

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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 Factary Phi), company websites, LinkedIn profiles and press sources. This work is undertaken by Place2Be 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 researching our supporter database to find supporters who have made large donations to Place2Be (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.	

2. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

We may share your personal data for the following purposes and in line with this Policy:

- To help us deliver and operate our services, we may share your personal data with trusted third parties who perform functions on our behalf and help us to deliver our services, projects, fundraising activities and appeals, and in operating and maintaining our website. Third parties such as service providers (including website and data hosting providers, bookings and communications providers, content creation providers, database management providers, payment providers/processors, background/identity check providers, business communication providers, email distribution providers, direct marketing and data collection providers, data storage and analysis providers, and customer service support providers), business consultants, and professional advisors (including lawyers, auditors and accountants). These third parties will only act under our instruction and comply with similar and equally stringent undertakings of privacy and confidentiality.

- Where necessary for legal, regulatory, safeguarding or security purposes, we may disclose your personal data to third parties, including to law enforcement agencies, health bodies and applicable regulators if we are under a duty to do so, in order to comply with (or where we reasonably believe we are under a duty to comply with) any legal obligation; or in order to enforce any agreements we have in place with you; or to protect the rights, property, safety, or security of Place2Be, third parties, users of our services or the public. This may include information obtained through parent or family support services where Place2Be considers that recording, sharing or taking action is necessary to safeguard a child or vulnerable person. For example, where disclosure is required by law, we may disclose your personal data to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your personal data with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

- We may share your personal data with a prospective or new owner of our business or company and their advisors, should we, or any entity within Place2Be be the subject of a takeover, divestment or acquisition.

- We share your personal data where you give us express permission to do so in the course of your

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relationship with us from time to time.

- In the case of counselling placements at Place2Be, applications will be shared with the Place2Be recruitment team, recruiting managers, and interview panels. Where you are a volunteer counsellor on placement, we share your personal data with the relevant schools you are on placement with.

3. HOW LONG WILL WE KEEP YOUR PERSONAL DATA?

We generally retain your personal data only for as long as necessary to fulfil the purposes outlined in this notice. In determining the appropriate retention period for different types of personal data, we always consider the following factors (i) amount, nature, and sensitivity of the personal data in question, (ii) the potential risk of harm from unauthorised use or disclosure of that personal data; (iii) the purposes for which we need to process it and whether we can achieve those purposes by other means; (iv) any permissions you give us with regards to your personal data; (v) our contractual obligations and rights in relation to the personal data involved; (vi) our legal obligation(s) under relevant laws to retain data for a certain period of time; (vii) our legitimate interests; (viii) whether retention is advisable in light of our legal position (such as regarding applicable statute of limitations, investigations, litigation, and other potential and actual disputes); and (ix) any guidelines issued by relevant data protection authorities. amount, nature, and sensitivity of the personal data in question, the potential risk of harm from unauthorised use or disclosure of that personal data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).

4. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

We are in the United Kingdom and store your personal data in the United Kingdom. Some of our third-party service providers may process your data outside of the UK. Where this occurs, we ensure your personal data is protected in a manner that is consistent with how your personal data will be protected by us in the UK. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the UK Secretary of State as offering an adequate level of protection for personal data; or

- appropriate safeguards are in place, such as Standard Contractual Clauses approved by the Information Commissioner's Office or equivalent mechanisms, to protect your personal data.

In certain circumstances, we may also rely on exemptions under data protection law (i.e. exceptions to the normal rules on international transfers) to transfer your personal data outside the UK, where we are legally permitted to do so.

You can obtain more details about the protection given to your personal data when it is transferred outside the UK (including a copy of the standard contractual clauses which we have entered into with recipients of your personal data) by contacting us at Privacy@Place2Be.org.uk.

5. YOUR RIGHTS

By law, you have a number of rights (subject to certain conditions and exceptions) when it comes to your personal data and can exercise any of these rights by contacting us at Privacy@Place2be.org.uk.

Please note that we may keep a record of your communications to help us resolve any issues which you raise.

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You may have the following rights in relation to your personal data:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to access and receive a copy of the personal data we hold about you, along with supplemental transparency information similar to what is provided in this Policy, and to check that we are lawfully processing it.

- Request correction of the personal data that we hold about you. This enables you to have us correct your personal data if it is incomplete or inaccurate.

- Request erasure of your personal data. This enables you to have us delete or remove personal data where there is no good reason for us continuing to process it or where you have successfully exercised your right to object to our processing of your personal data.

- Request the processing of your personal data. This enables you to have us suspend any further use of your personal data, for example, if you want us to establish its accuracy or the reason for processing it.

- Right to object to the processing of your personal data.

- Request portability of your personal data. This enables you to request we provide you or another party with any personal data we have obtained from you, in a structured, machine readable and reusable format.

- Withdraw consent to the processing of your personal data. You have the right to withdraw your consent at any time where we rely on your consent as a lawful basis for processing your personal data.

- Not be subject to decisions based solely on automated processing (including profiling) which have a legal effect on you or a similarly significant effect on you. This is relevant where we have decided to use automated systems to process your personal data with no real human involvement. We do not currently engage in this type of processing activity.

- Lodge a complaint with a data protection regulator. You have the right to lodge a complaint about the way we handle or process your personal data with the UK Information Commissioner's Office (ICO). For further details on how you can contact the ICO, please see their website: Information Commissioner's Office (ICO). We would however appreciate the opportunity to resolve your complaint before you contact the ICO, so we would encourage you to contact us in the first instance.

6. CHANGES TO OUR PRIVACY POLICY

Our Privacy Policy may change from time to time, so please check this page occasionally to see if we have included any updates or changes, and that you are happy with them. We will also inform you where we have made substantial changes.

(Last updated: October 2026)

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