



Place2Be External Privacy Policy

Place2Be is committed to your privacy where we handle your personal data. This privacy policy ("Policy") sets out the basis on which any of your personal data will be collected, stored, and used by us where you use our website <https://www.place2be.org.uk/> or otherwise interact with us. Personal data here means any information that we collect about you that relates to you or that can be used to identify you. References to "Place2Be", "we" or "us" in this Policy are to Place2Be, a company limited by guarantee (company number: 02876150) and a charity registered in England and Wales (registered charity number: 1040756) and Scotland (registered charity number: SC038649) with its registered office address at 175 St. John Street, London, EC1V 4LW. Place2Be is the controller of your personal data (this means we are responsible for your personal data).

If you have any questions about this privacy policy or how we handle your personal data, please contact our Data Protection Officer at 175 St John St, London, EC1V 4LW or by emailing Privacy@Place2Be.org.uk.

Please see the Place2be Online Recruitment Privacy Policy for information on how we process personal data for the purposes of recruitment.

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1. HOW WE USE YOUR PERSONAL DATA

We collect personal data about you, either directly from you, from a third-party source or by automated means (for example, when you use our website).

The table below sets out clearly how we collect and use your personal data. Please note that under data protection law, we can only use your personal data where we have a lawful reason or justification (also called a "lawful basis") and this can be either "to carry out a contract with you or to take steps on your instruction prior to entering a contract with you"; "where we have a legal obligation"; where you have given us your consent"; or "where it is necessary for our legitimate interests" (this means that we have commercial interests in using your personal data that are not unfair to you). 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.

Please note that if you choose not to provide personal data requested by us, or refuse our use of your personal data, we may not be able to provide you with the services you have requested where this personal data is necessary, or these services may be delayed.

Information you give us

Personal data we collect	How we use your personal data and our lawful basis
<p><u>Account Registration</u></p> <p>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.</p>	<p><u>Legitimate Interests</u></p> <ul style="list-style-type: none"> 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.
<p><u>Event or Webinar Registration</u></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><u>Legitimate Interests</u></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><u>Donations</u></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><u>Legitimate Interests</u></p> <p>We use your personal data to administer any one-off or on-going donations you make and to claim any Gift Aid.</p> <p><u>Legal Obligation</u></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>
<p><u>Marketing Communications and Updates (Including for Fundraising)</u></p>	<p><u>Consent</u></p> <ul style="list-style-type: none"> We use your personal data to contact you with marketing communications (and to manage

<p>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).</p>	<p>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 opt-out of receiving these communications at any time by selecting the unsubscribe link in any email we send you, or by contacting us.</p> <ul style="list-style-type: none"> 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. <p><u>Legitimate Interests</u></p> <p>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.</p>
<p><u>Market Research, Surveys, Reviews and Testimonials</u></p> <p>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.</p>	<p><u>Legitimate Interests</u></p> <ul style="list-style-type: none"> 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. <p><u>Consent</u></p> <p>We use your personal data to publish your reviews and testimonials on our website and/or marketing materials where you are identifiable.</p>

<p><u>Customers/Suppliers/Partners and Representatives</u></p> <p>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.</p>	<p><u>Legitimate Interests</u></p> <p>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.</p>
<p><u>Contacting Us</u></p> <p>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.</p>	<p><u>Legitimate Interests</u></p> <p>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.</p>
<p><u>Visitors</u></p> <p>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.</p>	<p><u>Legitimate Interests</u></p> <p>We use your personal data to facilitate your access to our premises, to ensure security of our premises and for our record keeping purposes.</p>
<p><u>Training Courses</u></p> <p>You give us personal data about you when 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).</p> <p>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.</p>	<p><u>Consent</u></p> <p>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.</p> <p><u>Performance of Contract</u></p> <ul style="list-style-type: none"> • 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.

	<p><u>Legitimate Interests</u></p> <ul style="list-style-type: none"> • 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 pseudonymised 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. <p><u>Legal Obligation</u></p> <ul style="list-style-type: none"> • 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.
<p><u>Counsellors on Placement</u></p> <p>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.</p>	<p><u>Consent</u></p> <p>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.</p> <p><u>Legitimate Interests</u></p> <ul style="list-style-type: none"> • 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. <p><u>Legal Obligation</u></p> <ul style="list-style-type: none"> • We use your personal data to comply with our legal obligation to make reasonable adjustments/accommodations to our counsellors on placement application process

	<p>and programme, where you have informed us of any disabilities or access requirements.</p> <ul style="list-style-type: none"> 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 school.
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Information provided by third parties

Personal data we collect	How we use your personal data and our lawful basis
<p><u>Event Organisers</u></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 Place2Be 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><u>Legitimate Interests</u></p> <ul style="list-style-type: none"> 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. We use your personal data to communicate with you about the specific fundraising event/activity you have chosen to participate in for Place2be.
<p><u>High Value Event Planning</u></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><u>Legitimate Interests</u></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><u>Personal data provided by your affiliated company</u></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 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.</p>	<p><u>Legitimate Interests</u></p> <p>We use your personal data strictly in the context of the business purposes with your affiliated company.</p>
<p><u>Referrals</u></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 Place2Be.</p>	<p><u>Legitimate Interests</u></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><u>Visiting our website</u></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><u>Legitimate Interests</u></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><u>Cookies (and Similar Technologies)</u></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.</p> <p>Please see our Cookie Policy for more information on what cookies (and other similar technologies) are and how we use them.</p>	<p><u>Consent</u></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><u>Legitimate Interests</u></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><u>Ethical Screening</u></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</p>	<p><u>Legitimate Interests</u></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>

apply to any of the above personal data we collect about you.	
<p><u>Fraud and Security Monitoring</u></p> <p>Our fraud and security monitoring processes may apply to any of the above personal data we collect about you.</p>	<p><u>Legitimate Interests</u></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><u>Business Administration</u></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><u>Legitimate Interests</u></p> <p>We use your personal data as necessary to operate our business efficiently.</p>
<p><u>Legal Claims and Compliance with Legal Obligations</u></p> <p>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.</p>	<p><u>Legitimate Interests</u></p> <p>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.</p> <p><u>Legal Obligation</u></p> <p>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.</p>
<p><u>Donor analysis</u></p> <p>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.</p> <p>Information that may be collected by Place2Be 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 Place2Be directly and not by</p>	<p><u>Legitimate Interests</u></p> <p>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.</p> <p><u>Consent</u></p> <p>Place2Be will always seek to present our privacy policy to donors and prospective donors as soon as we are able to.</p> <p>Data regarding prospective high value donors we decide to contact is kept for the duration of that</p>

<p>third parties. All information is processed securely and in line with other data collection processes.</p> <p>Another method of analysis is by research of 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.</p>	<p>individual's relationship with Place2Be in accordance with our usual retention schedule. Top-line 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.</p>
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2. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

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

- We 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 also in operating and maintaining our website. Third parties such as service providers (including website and data hosting 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.
- We share your personal data 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. 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 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.

- In the case of participation on training courses with Place2Be, we share your personal data with the DFE (including quality assurance bodies acting on behalf of the DFE) and other relevant funding partners during your training course. We share with DFE information on your responses to DFE evaluation questions and evaluation data we hold on to you. We will not share your personal data without your consent. We also share your name, postal address and School URN with the DFE or other funding partner, where you have engaged with or completed a training course you are booked on, or where you have not paid any fees owed.

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 with regard to 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 located in the United Kingdom and store your personal data in the United Kingdom/EEA.

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.

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 restriction of 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.
- **Request to object to the processing of your personal data.** You have the right to object to us processing your personal data where we do so for one of the following four reasons: (i) because it is within our legitimate interests; (ii) to enable us to perform a task in the public interest or exercise official authority; (iii) to send you direct marketing materials; and (iv) for scientific, historical, research, or statistical purposes.
- **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 decide 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 a national data protection regulator or supervisory authority. In the UK, this is the Information Commissioner's Office (ICO). For further details on how you can contact them, please see their website: [Information Commissioner's Office \(ICO\)](https://ico.org.uk).

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: July 2023)