

Data Protection Policy

At Let's Talk About Loss we take your privacy extremely seriously and any data or information that you give us is protected and secured. We comply with the General Data Protection Regulations and all other relevant legislation on privacy and information handling.



When you use our website, social media pages or provide any personal information to us, you are giving consent for us to collect and use your information. Below is a copy of our data protection policy - if you need this in a different format, please contact us at hello@letstalkaboutloss.org.

This policy was last updated in April 2021.

Introduction

Let's Talk About Loss respects your privacy and is committed to protecting any personal data you share with us. This policy will explain further how we look after your data and explain your privacy rights.

Important information

Purpose of this privacy policy

This policy aims to give you information on how Let's Talk About Loss collects and processes your personal data through your use of this website and your interactions with us, including any data you may provide when you sign up to our newsletter, sign up for our free or paid services or offerings, take part in a competition, or make a donation to us.

It is important that you read this Privacy Policy together with any other privacy policy or notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other policies or notices and is not intended to override them.

Controller

Let's Talk About Loss (LTAL) is the data controller and responsible for your personal data. Our data privacy manager is responsible for overseeing questions in relation to this policy. The data privacy manager is Beth French and can be contacted in the following ways:

Email: hello@letstalkaboutloss.org

If you wish to discuss or make a complaint about any aspect of data protection, please contact us in the first instance. You may also contact the Information Commissioner's Office (ICO) via www.ico.org.uk.

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.

What data do we collect?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you. Please note that we will never collect data unless it is necessary and unless we have gained your permission to do so.

Identity Data	includes first name, last name, title, date of birth and gender
Contact Data	includes billing address, delivery address, email address and telephone numbers
Financial Data	includes bank account and payment card details

Transaction Data	includes details about payments to and from you and other details of products and services you have purchased from us
Technical Data	includes internet protocol (IP) address, 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 our website
Profile Data	includes purchases or orders made by you and survey responses
Usage Data	includes information about how you use our website, products and services
Marketing and Communications Data	includes your preferences in receiving marketing from us and our third parties and your communication preferences
Personal Data about Children	Includes gender, address and age

We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

What if you don't want to give us your data?

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to

perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case.

How we will use your personal data

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 you have consented for us to do so;
- 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 or regulatory obligation.

When we will use your data

We have compiled a list of the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us via email at hello@letstalkaboutloss.org if you need details about the specific legal ground we are relying on to process your personal data.

Purpose	Type of data	Lawful basis for processing including basis of legitimate interest
When you purchase an item from our Etsy shop	Identity, Contact, Personal Data	Performance of a contract with you.
When you make a donation	Identity, Contact, Financial, Transaction, Marketing and Communications	Performance of a contract with you.
When you complete a	Identity, Contact, Profile,	Necessary for our

survey, enter a competition or receive an update from us	Marketing and Communications	legitimate interests (e.g. for growing our services, inform our strategy and improve our work).
When you participate in a project or service	Identity, Contact, Profile, Marketing and Communications	Performance of a contract with you and necessary for our legitimate interests.
When you use our website, social media or are served an advert online	Identity, Contact, Profile, Usage, Marketing and Communications, Technical	Necessary for our legitimate interests.

Marketing

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

Promotional offers

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products or services from us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party marketing

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

Opting-out

You can ask us or third parties to stop sending you marketing messages at any time by:

- following the opt-out or “unsubscribe” links on any marketing message sent to you; or
- contacting us via email at hello@letstalkaboutloss.org at any time

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product or service purchase, product or service experience, donation or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via email at hello@letstalkaboutloss.org.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

When we might share your data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

A list of Third Parties and Purpose of disclosure

Mailchimp: To send email communications and manage email subscriber lists

Stripe: To manage donations and financial transactions through our website

We may also share your personal data with service providers who we engage to work with our business, including but not limited to those providing IT support, administrative support, and professional advice such as legal and financial advisers.

We may also share your personal data with third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

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 of the protection of personal data in non-EU countries.
- 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.

Please contact us via email at hello@letstalkaboutloss.org if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data retention

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six (6) years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see below 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.

Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

1. Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
2. Request correction of your personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see clause 9.4 below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
5. Request restriction of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data’s accuracy;
 - where our use of the data is unlawful, but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
6. Request transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
 7. Right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us via email at hello@letstalkaboutloss.org

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.

When we'll respond

We try to respond to all legitimate requests within one (1) month from receiving the request from you. 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 on expected timeframes.