

Privacy Notice

1. General

This privacy notice applies to Embrace Finance (trading name of Community Counts Training and Consultancy Ltd) (registered company number 11338373).

We take the privacy of your information seriously. This privacy notice tells you, the user of our services, that is our training, our mentoring, our consultancy services and the other activities that we pursue to ensure we achieve our mission, about our practices regarding the collection, use and disclosure of personal and other information about you or your organisation that may be provided via our website or collect through other means such as an online form, email, or telephone communication.

2. Basis on which we use personal information

Personal information we hold about you will be collected and used either because:

- the use is necessary in pursuit of a “legitimate interest”, a legitimate interest in this context means a valid interest we have or a third party has in use your personal information which is not overridden by your interests in privacy and security, for example, if you are connected to an organisation that we wish to engage with in order for us to promote or deliver our services; or
- the use is necessary in order for us to comply with our obligations under a contract between you and us; or
- you have consented to the use for the specific purposes described in this notice, for example via joining our mailing list.

3. Ways in which we may collect your personal information

We may collect and process the following personal information (information that can be uniquely identified with you) about you:

- your name, telephone numbers and email address which you provided to sign up to and access our services;
- payment information which we may use to collect payment (if applicable);
- a record of any correspondence between you and us;
- replies to any surveys or questionnaires that we may use for research purposes;
- details of your visits to our website, the resources and pages that you access and any searches you make;
- any information we may require from you when you report a problem or complaint.

We only collect such information when you choose to supply it to us but please note there may be instances where we process your personal information which has been provided to us by a third party. For example, if you sign up to an event that you have booked via EventBrite.

If we do obtain your personal information from a third party your privacy rights under this notice are not affected and you are still able to exercise the rights contained within this notice.

You do not have to supply any personal information to us but our services may not be operable in practice without providing personal information to us. You may withdraw our authority to process your personal information at any time. We respectfully your right to do so but regret that our services may not be fully operable should you do so.

5. Reasons why we process your personal information

We will use your information to:

- manage your booking or service that we are providing to you
- process your registration at an event and contact you with information on that event;
- manage your communication preferences to provide relevant information that we believe is of interest to you such as upcoming learning opportunities;
- assist in making general improvements to our services;
- carry out and administer any obligations arising from any agreements entered into between you and us;
- ensure that the content of our website is presented in the most effective manner for you and for your device;
- customise our services to your preferences and analyse how our services are used to identify trends, keep services relevant and ensure we offer the best service possible;
- contact you and notify you about changes to our services or the services we offer (except where you have asked us not to do this);
- administer our Service and for internal operations, including troubleshooting, information analysis, testing, research, statistical and survey purposes;
- enable us to implement systems and processes internally that allow us to administer the services we offer.

6. Information Retention

We review the personal information (and the categories of personal information) we are holding on a regular basis to ensure the information we are holding is still relevant to our business and is accurate. If we discover that certain information we are holding is no longer necessary or accurate, we will take reasonable steps to correct or delete this information as may be required.

If you wish to request that information we hold about you is amended or deleted please email us and we will remove you within 2 working days.

7. Sharing your information

We do not disclose any information you provide to any third parties other than as follows:

- when you book an event via EventBrite
- when you join our mailing list we store the details you share with us on Mailchimp
- when you pay for an event via Paypal
- when you book a service via Calendly
- where we are required to do so for legal purposes:
 - if we are under a duty to disclose or share your personal information in order to comply with any legal obligation (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime);
 - in order to enforce any terms and conditions or agreements for our services that may apply;
 - to protect our rights, property and safety, or the rights, property and safety of our users or any other third parties. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

8. Security

We will take all reasonable steps to ensure that appropriate technical and organisational measures are carried out in order to safeguard the information we collect from you and protect against unlawful access and accidental loss or damage. These measures may include (as necessary):

- protecting our servers by software firewalls;
- locating our information use storage facilities in secure locations (we use DropBox and MS OneDrive and third party apps such as EventBrite, Calendly and Paypal);
- when necessary, disposing of or deleting your information so it is done so securely.

We will ensure that our employees are aware of their privacy and information security obligations.

This notice and our procedures for handling personal information will be reviewed as necessary.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site; transmission is at the user's own risk. Once we have received your information, we will use the strict procedures and security features referred to in this clause to try to prevent unauthorised access.

9. Your privacy rights

You have a right to know about how we protect your personal information and we have outlined this in this policy. If you have any further queries please do not hesitate to contact us on the contact details set out below.

If you would like to update your personal information or let us know the personal information we hold is incorrect you may do so by contacting us on the details below.

You always have the right to unsubscribe from our membership and event communications and we will always offer this service in our communications to you. Should you wish to do this we will ensure you are unsubscribed as soon as possible and always within one month.

Where we rely on your consent to contact you, you always have the right to withdraw your consent. To do so please contact us on the contact details below and we will ensure this is actioned as soon as possible and always within one month.

You also have a right to restrict our use of your personal information and the right to object to your personal information being processed. Should you wish to do so, please contact us on the details below.

You have the right to ask us to delete your personal information. Unless we have reasonable grounds to refuse to delete your personal information, we will securely delete the personal information in question within one month. The personal information may continue to exist in certain backup, but we will take steps to ensure that it will not be accessible.

You have the right to request access to the personal information that we hold about you.

If a breach is likely to result in a risk to your information rights and freedoms, we will notify you as soon as possible and we may also report it to the ICO.

10. Other websites

Our website may contain links and references to other websites. Please be aware that this notice does not apply to those websites.

We cannot be responsible for the privacy policies and practices of sites that are not operated by us, even if you access them via the website and/or any other service that is operated by us. We recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

In addition, if you came to this website via a third party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

12. Notification of changes to the contents of this notice

We will post details of any changes to our policy on our website to help ensure you are always aware of the information we collect, how we use it, and in what circumstances, if any, we share it with other parties.

13. Policy towards children

The service is not intended for and should not be accessed by individuals under 16. Our policy is not to intentionally or knowingly collect, process, maintain or use personal information from any individual under the age of 16.

14. Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry or complaint relating to your personal information or how it is handled, you can do so via the following email address liz@embracefinance.org.uk.

If we are unable to resolve any issues you may have or you would like to make a further complaint, you can contact the ICO by visiting <http://www.ico.org.uk/> for further assistance.

15. Using Material from this Site

You may download, store and use the material on our website for your own personal use and research, or that of your charity, company or organisation. If you wish to republish, retransmit, redistribute or make available material from our website to another party, please seek our prior consent.