Privacy Policy

Contents

1. Introduction 1

2. Policy Statement 2

3. Collection of information 2

4. Personal information - Justification of collection 4

5. Use of information 6

6. Cookies 6

7. Images and recordings 9

8. Security of information 9

9. Sharing of information 9

10. How long will Soundabout store information? 10

11. Individuals' Rights 10

12. How to complain 11

13. Changes to this Privacy Policy 11

Review 11

1. Introduction

On 25 May 2018, the General Data Protection Regulation ("**GDPR")** was enforced across Europe, including the UK via the Data Protection Act 2018. The law aims to give citizens more control over their data and to create one set of rules that are enforced across Europe. GDPR covers both written information and information stored and created on computers.

Soundabout has a duty to work within the new regulations as it "collects, stores and processes" data about individuals when undertaking its operations. The Trustees of Soundabout will endeavour to ensure data is managed within the requirements and will minimise access etc. to any personal data to a minimum, within its work. The following policy is not a definitive statement on the GDPR, but seeks to interpret relevant regulations and guidance where they affect Soundabout.

The CEO has overall responsibility for data protection within Soundabout and is the nominated Data Controller. Each Soundabout representative who processes personal information and data is a Data Processor acting on the Data Controller's behalf and also has a legal obligation to adhere to the Regulations.

2. Policy Statement

Soundabout is committed to meeting its obligations and ensuring compliance with the Data Protection Act 2018, the UK GDPR, the Privacy and Electronic Communications Regulations ("**PECR**") and the Data (Use and Access) Act 2025 (the "**DUAA**", together the "**Acts**") . Soundabout will:

- respect the rights of each individual
- be open and transparent about the personal data it holds
- strive to observe the law in all collection and processing of subject data
- meet any subject access request in compliance with the law
- provide training and support to Soundabout representatives who handle personal data in the course of their duties
- maintain an up-to-date Information Commissioner's Office (ICO) registration (which requires changes to the registration within 28 days of any adjustments)
- inform the ICO of breaches of the Acts (where required)
- include Data Protection guidance for all trustees and employees

Soundabout will only use data in ways relevant to carrying out its legitimate purposes and functions as a charity in a way that is not prejudicial to the interests of individuals. Soundabout will take due care in the collection and storage of any sensitive data. Soundabout representatives will do their utmost to keep all data accurate, timely and secure.

Soundabout's nominated Data Controller is the CEO. All Soundabout representatives will be aware of the requirements of the Data Protection Act when they collect or handle data about an individual. Soundabout representatives will not disclose data except where there is subject consent or legal requirement. Data sent to outside agencies will always be protected by a written contract. All collection and processing will be done in good faith. Paper records will be destroyed when no longer required.

3. Collection of information

Soundabout may collect and process the following categories of personal data when individuals interact with the charity:

- Identity data
- Contact data
- Usage and technical data
- Financial details
- Transaction data
- Communications data
- Children's data (including identity, contact data and communications data)

Soundabout may also process 'special category' or sensitive classes of personal data when individuals, including children, interact with the charity, including:

- Health data
- Racial or ethnic origin
- Religious beliefs

Soundabout may collect information about individuals whenever they interact with the charity, for example when individuals:

- Register (on behalf of children, young people and vulnerable adults) to participate in Soundabout activities/sessions
- apply to volunteer or work as a Soundabout practitioner
- enquire about our activities, visit our website or donate to the charity
- sign up to receive our newsletter
- attend a Soundabout event and provide us with information about you
- fundraise on our behalf
- post content to Soundabout's social media
- contact us by email, online contact form, phone, SMS, social media or post

Soundabout may collect information in the following ways and information may be collected through a third-party platform:

- when individuals provide information directly in booking places for Soundabout sessions
- when individuals provide information directly as a volunteer or Soundabout practitioner
- when individuals provide information directly, for example by providing details when they request information or make a donation
- when individuals provide information indirectly, for example when using other fundraising sites and provide consent to be contacted by Soundabout
- when individuals connect with Soundabout on social media and messaging services
- when individuals use Soundabout websites and information about the visit is recorded and stored (e.g. Google Analytics for website statistics tracking, or cookies)
- when information about individuals is available indirectly from other public sources, Soundabout may collect personal details from the public domain, such as from company websites and news sites, to provide background information about an individual for Soundabout representatives in preparation for a meeting/event. This information will only be used for this purpose and not stored after the meeting/event unless consent has been provided by the individual.

Each information collection system will make individuals aware of this policy and include a statement to ensure they are aware of their right to ask not to be contacted for marketing and fundraising purposes.

Under the Acts, the processing of ordinary categories of personal data is lawful only if one or more of the following applies:

- processing of the data is carried out with the consent of the data subject;
- processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract;
- compliance with a legal obligation;
- protecting the vital interests of a data subject or another person;
- performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- the purposes of legitimate interests pursued by the controller or a third party - except where such interests are overridden by the interests, rights or freedoms of the data subject, or where the processing is being carried out by public authorities in the performance of their tasks; and

- there is a Recognised Legitimate Interest, including safeguarding, crime prevention, national security and emergency response (or as otherwise provided by the DUAA).

The processing of special categories of personal data (such as that revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership) is prohibited unless certain specified criteria are satisfied, including but not limited to:

- it relates to data manifestly made public by the data subject;
- processing is carried out with the explicit consent of the data subject;
- it is necessary to carry out obligations under employment, social security or social protection law, or a collective agreement; and
- reasons of substantial public interest derived from EU or member state law, where the processing is proportionate to the aim and contains appropriate safeguards.

Soundabout may use automated tools and systems to make decisions about individuals. Some of these decisions may have legal or similarly significant effects. If Soundabout chooses to rely on automated decision making, we will ensure that the following safeguards are applied:

- We will provide individuals with clear and accessible information about any significant automated decision made about them;
- Individuals will be able to make representations about the decision making, including being allowed to express their point of view and submit additional information relevant to the decision;
- We will offer individuals the right to request human intervention, whereby an appropriate member of Soundabout staff will review the decision and, where appropriate, make a meaningful intervention such as overturning or changing the decision; and
- Individuals will be able to challenge any decision should they believe it is inaccurate or unfair.

Soundabout will not use special category data in any solely automated decisions that have legal or similarly significant effects unless authorised by law or based on that individuals' explicit consent.

An individual may exercise their rights in related to automated decision using the contact details at section 12 of this Policy.

4. Personal information - Justification of collection

Stakeholder Group	Requirement for data/information (Legitimate Interests)	Consent Required
Beneficiaries – children, young people and vulnerable adults with disabilities, and their siblings	• management of Soundabout activities/projects • impact measurement • anonymised data may be used to inform Soundabout planning and provision of activities/projects	• use as case studies • use of images/recordings (aged 13+ and has the capacity to consent)
Parents/guardians of beneficiaries	• management of Soundabout activities/projects • impact measurement	• engagement in case studies • parental/guardian consent for use of images/recordings of their children

		• marketing • fundraising
Previous beneficiaries – children, young people and vulnerable adults	• impact measurement • anonymised data may be used to inform Soundabout planning and provision of activities/projects	• use as case studies • use of images/recordings (aged 13+ and has the capacity to consent)
Parents/guardians of previous beneficiaries	• impact measurement	• parental/guardian consent for use of their children's images • marketing • fundraising
Teachers/Practitioners who take part in training/activities	• management of Soundabout activities/projects	• marketing • fundraising
Soundabout Trustees	• management and governance of the charity	• use of images • marketing • fundraising
Volunteers	• volunteer management	• use of images • marketing • fundraising
Contractors	• contract management	• use of images • marketing • fundraising
Individual supporters	• receipt and acknowledgement of donation • management of Gift Aid	• marketing • fundraising
Lapsed supporters (last donated three+ years ago)	• management of Gift Aid (declarations should be kept for six years after the accounting year end that includes the last donation to which they relate)	• marketing • fundraising
Individual donor through third party fundraising website	• receipt and acknowledgement of donation	• marketing • fundraising
Corporate and philanthropic supporters	• acknowledgement of support • relationship management	• marketing • fundraising
Organisational supporters	• acknowledgement of support • relationship management	• marketing • fundraising
Individuals who signed up for the newsletter on the website	• newsletter subscription	• marketing • fundraising
Individuals who follow Soundabout on social media	• social media contact	• marketing via other channels • fundraising via other channels

Individual/organisation who sent an enquiry	• response to the enquiry	
Suppliers	• management of the charity	• marketing • fundraising

In the instances outlined in the above justification of collection, Soundabout will only process personal information without consent when we are legally allowed to do so. This will only be where it is in the charity's legitimate interests to do so and where we are confident that such processing is not likely to prejudice individuals' legitimate interests or rights and freedoms.

In all other instances, Soundabout will process personal information on the basis of consent that has been given by individuals, who are entitled to withdraw that consent at any time such that we can no longer rely on it as a basis for continuing to process their personal information.

5. Use of information

Soundabout will use personal information in a range of ways, which include:

- to provide individuals with the support or information they have requested
- to provide inclusive Soundabout activities and sessions
- to update individuals about any changes to Soundabout services
- to administer donations, including Gift Aid processing
- to support individuals' fundraising activities
- to maintain organisational records and ensure we have up-to-date marketing and communication preferences for individuals
- to send newsletters or other information about Soundabout's work
- to invite individuals to participate in fundraising activities and attend events
- to invite individuals to make donations to support Soundabout's work
- to invite individuals to participate in surveys or research
- to analyse and improve the operation of our websites
- to analyse individuals' use of our websites

Soundabout requires special category data (as defined in the UK GDPR) to plan Soundabout sessions and activities. We will process any special category data only in relation to participation in Soundabout services and will destroy it when no longer needed. Soundabout recognises that some of our online services may be accessed by children. Accordingly, we will ensure that any personal data and special category data collected in relation to children will be appropriately safeguarded, for example by:

- ensuring explicit consent, be that from the child or from a parent/guardian, is obtained when handling children's data; and
- ensuring our privacy notices are written in clear, age appropriate language so that children can understand their rights and be assisted to exercise them easily.

6. Cookies

Soundabout uses cookies and similar technologies to recognise you when you visit our websites at www.soundabout.org.uk ("Website(s)"). In some cases, we may use cookies to collect personal information, or that becomes personal information if we combine it with other information.

Cookies are small data files that are placed on your computer or mobile device when you visit a website. Cookies are widely used by website owners in order to make their websites work, or to work more efficiently, as well as to provide reporting information.

Cookies set by the website owner (in this case, Soundabout) are called "first-party cookies." Cookies set by parties other than the website owner are called "third-party cookies." Third-party cookies enable third-party features or functionality to be provided on or through the website (e.g., advertising, interactive content, and analytics). The parties that set these third-party cookies can recognise your computer both when it visits the website in question and also when it visits certain other websites.

We use first- and third-party cookies for several reasons. Some cookies are required for technical reasons in order for our Websites to operate, and we refer to these as "necessary" cookies. Other cookies also enable us to track and target the interests of our users to enhance the experience on our Online Properties. Third parties serve cookies through our Websites for advertising, analytics, and other purposes. This is described in more detail below.

You have the right to decide whether to accept or reject cookies. You can exercise your cookie rights by setting your preferences in the Cookie Settings. The Cookie Settings Manager allows you to select which categories of cookies you accept or reject. Necessary cookies cannot be rejected as they are strictly essential to provide you with services.

The Cookie Settings Manager can be found in the notification banner at the bottom of our website. If you choose to reject cookies, you may still use our website though your access to some functionality and areas of our website may be restricted. You may also set or amend your web browser controls to accept or refuse cookies.

The specific types of first- and third-party cookies served through our Websites and the purposes they perform are described in the table below (please note that the specific cookies served may vary depending on the specific Online Properties you visit):

Necessary website cookies:

These cookies are strictly essential for the website to function properly. These cookies ensure basic functionalities and security features of the website, anonymously.

Performance cookies:

Performance cookies are used to understand and analyse the key performance indexes of the website which helps in delivering a better user experience for the visitors.

Functional cookies:

Functional cookies help to perform certain functionalities like sharing the content of the website on social media platforms, collect feedbacks, and other third-party features.

Analytics cookies:

Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.

Advertising cookies:

Advertisement cookies are used to provide visitors with relevant ads and marketing campaigns. These cookies track visitors across websites and collect information to provide customized ads.

Other cookies:

Other uncategorized cookies are those that are being analyzed and have not been classified into a category as yet.

Cookie name	Duration	Description
cookielawinfo-checkbox-analytics	11 months	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Analytics".
cookielawinfo-checkbox-functional	11 months	The cookie is set by GDPR cookie consent to record the user consent for the cookies in the category "Functional".
cookielawinfo-checkbox-necessary	11 months	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".
cookielawinfo-checkbox-others	11 months	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Other.
cookielawinfo-checkbox-performance	11 months	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Performance".
viewed_cookie_policy	11 months	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.

You can refuse cookies through your web browser, you should visit your browser's help menu for more information as the settings vary from a browser to another.

7. Images and recordings

Soundabout uses images, video and audio recordings on its websites and within publications, and has a detailed photography, video and audio recording policy that covers this practice. We do not permit photographs, other images, video or audio recordings of children, young people and vulnerable adults to be taken without the consent of the parents/guardians and the young person if aged 13 years or older and has the capacity to consent. This consent is valid whilst the child is a beneficiary of Soundabout and for up to two years afterwards.

All images, video and audio recordings will be stored securely, and identified only through a child's first name and first letter of their surname (so they cannot be traced). If images, video or audio recordings are selected to be used in high-profile contexts (such as YouTube videos and television programmes), we always ask further permission of parents/guardians and children. We take all steps to ensure these images are used solely for the purposes they are intended.

8. Security of information

Soundabout places significant importance on the security of individuals' personal information and we will always try to take appropriate precautions to protect it by:

- ensuring that there are appropriate technical controls in place to protect personal details on our websites and internal systems
- ensuring that only authorised personnel (i.e. selected Soundabout staff, volunteers or contractors) have access to your information, and that they are appropriately trained to manage personal information.
- ensuring that donations and payments are processed securely
- Keeping written documents with personal data in a locked filing cabinet

Should Soundabout suffer a data loss or breach, the individual identifying the breach will pass all relevant information to the nominated Data Controller (CEO) who will record the incident information and assess if the loss/breach is significant enough to be reportable to the ICO. GDPR requires that data losses/breaches are reported within 72 hours by the Data Controller and this will be strictly complied to by Soundabout.

9. Sharing of information

Before using any external organisations to collect and/or process personal data on our behalf, Soundabout will perform rigorous checks to ensure they meet all relevant regulations and legislation. The contract will impose robust data protection requirements, including the provisions of this policy, and seek to provide maximum protection of individuals' personal information.

Although Soundabout is based in the UK, we may transfer personal data to countries outside of the UK (for example, to a secure server) if we consider it necessary or desirable for the purposes set out in this Policy. Soundabout will also ensure that any transfers of data outside of the UK will not be to a country which offers protections that are not materially lower than UK standards under the Acts. Where a country does not benefit from a UK adequacy regulation, we will implement appropriate safeguards which may include:

- UK-approved international data transfer agreements or standard contractual clauses
- Binding corporate rules

- Technical and organisational protective measures, such as encryption and access controls

Soundabout may legally be required to disclose personal information if required to do so by law. Such circumstances might include safeguarding, prevention and detection of crime, terrorism and legal proceedings. We will only ever share personal information in other circumstances if we have consent to do so. Such consent will be recorded and include the information to be shared and with whom. We will never sell personal information to third parties.

10. How long will Soundabout store information?

Soundabout will hold individuals' personal information on our systems for as long as is necessary for the relevant activity.

Soundabout has set a limit of three years for holding data valid since last proactive communication from the individual. After three years if the individual has not made any contact with Soundabout, the information will be either renewed by an individual (we will email each individual to seek consent renewal) or deleted from our database (unless it includes details of a Gift Aid donation, which will be kept for six years after the accounting year end that includes the last donation to which they relate).

Soundabout will maintain a list of signed photographic consents where individuals are identifiable, and the images are used for publicity or promotional purposes. Images captured for historical records will be exempt.

If an individual asks Soundabout to stop sending marketing and/or fundraising materials, we will keep a record of the individual's contact details and appropriate information to enable us to comply with the request not to be contacted.

11. Individuals' Rights

The GDPR provides the following rights for individuals over their personal information and how we use it:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling

Individuals are not required to pay any charge for exercising their rights. If you make a request, we have one month to respond to you.

If an individual would like to exercise any of these rights, they should contact the nominated Data Controller (CEO) in writing at Soundabout, John Eccles House, Robert Robinson Avenue, Oxford Science Park, Oxford OX4 4GP, by calling 01235 797474 or by emailing info@soundabout.org.uk

Any visitors to Soundabout websites who do not want their data used by Google Analytics can install the Google Analytics opt-out browser add-on.

A data subject (individual) or approved agent may make a request to have a copy of all information held on them by an organisation. On receipt of a Data Subject Access Request, it will be passed immediately to the nominated Data Controller (CEO). The Data Controller will then check the validity of the subject access request for authenticity and, once authenticated, will conduct reasonable and proportionate searches to gather a response which will be sent to the data subject.

The Data Controller may 'stop the clock' on the time for the response to the data subject if they are unable to respond to a request without receiving further information or clarification from the data subject making the request.

12. How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Soundabout, John Eccles House, Robert Robinson Avenue, Oxford Science Park, Oxford OX4 4GP, by calling 01235 797474 or by emailing info@soundabout.org.uk. We will acknowledge receipt of complaints to us within 30 days. Without undue delay, we will take appropriate steps to respond to a complaint, including making appropriate enquiries and keeping complainants informed of progress on the complaint. We will tell a complainant about the outcome of their complaint without undue delay.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

13. Changes to this Privacy Policy

Soundabout will occasionally update this policy. Any updated policy will be shared on our website.

Review

	Date	Completed by
First Written	**2019-2020**	
Updated	**May 2023**	**Maryse Degbegni** (added cookies sections)
Trustee Approval	**July 2023**	**Simon Claridge**
Reviewed	**July 2024**	**Ben Weston-Conway**
Revised	**March 2026**	**LawWorks**