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**3.1. GDPR PRIVACY AND COOKIES NOTICE**

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# INTRODUCTION AND GENERAL TERMS

The aim of this privacy policy is to explain to you how we control and process your data. This includes the collection, usage, disclosure, transfer, storage and disposal of your data.

Acorn Independence is committed to protecting your personal information when you are using our services, which we want to be a safe and enjoyable experience. This Privacy and Cookies Policy relates to our use of any personal information that we collect from you when using our website and online services. It also relates to our use of any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

This Privacy and Cookies Policy explains the following:

• What information Acorn Independence may collect about you;

• How the Acorn Independence will use information we collect about you;

• When the Acorn Independence may use your details to contact you;

• Whether Acorn Independence will disclose your details to anyone else;

• Your choices regarding the personal information you provide to us;

• The use of cookies on Acorn Independence websites and how you can reject cookies.

Acorn Independence is committed to safeguarding your personal information. Whenever you provide such information, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal information, including the Data Protection Act/General Data Protection Regulation 2018 (these laws are referred to collectively in this Privacy and Cookies Policy as the "data protection laws"). No website can be completely secure.

The Acorn Independence website may contain hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, and are also likely to use cookies, and we therefore encourage you to review them. They will govern the use of personal information you submit when visiting these websites, which may also be collected by cookies. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

# WHO ARE WE?

Acorn Independence are an organisation that focuses on people and how they do things within organisations.

To find out more, please refer to our statement of purpose.

WHAT INFORMATION WILL Acorn Independence COLLECT ABOUT ME?

When using our website, the personal information other than business information that we collect may include but not be to your name, address, email address, IP address, and information regarding what pages are accessed and when. Like many other websites, the Acorn Independence website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps us to improve our website and deliver a better more personalised service. For more information please see the section on Cookies.

When interacting with the Acorn Independence office, either by phone, email or a face to face visit, we may collect information including but not to your name, address, email address and phone number.

When entering into a business agreement with Acorn Independence we may collect information including but not to your name, address, email address and phone number. Please note that sometimes we will require you to provide additional personal information, and sometimes sensitive personal information. When we do this, we will provide further information about why we are collecting your information and how we will use it.

# HOW WILL Acorn Independence USE THE INFORMATION IT COLLECTS ABOUT ME?

Acorn Independence will use your personal information for a number of purposes including, but not to, the following:

* To provide our services, activities or online content, to provide you with information about them and to deal with your requests and enquiries;
* To provide you with the most user-friendly online navigation experience;
* We may also show you relevant advertising on third party sites where you have agreed to this;
* To contact you about a submission you have made;
* To use IP addresses and device identifiers to identify the location of users, to block disruptive use, to establish the number of visits from different countries, and to determine whether you are accessing our services from the UK or not.
* For analysis and research purposes so that we may improve the services offered by Acorn Independence] . This can include using geo-demographic information from external sources, where this helps us ensure we are providing the best service possible;
* We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes;

Where Acorn Independence proposes using your personal information for any other uses we will ensure that we notify you first. Please see the section on Changes to Acorn Independence’s Privacy and Cookies Policy for details.

# WHEN WILL Acorn Independence CONTACT ME?

## General contact

We may contact you in relation to any contact or enquiry that you submit to us when using our website and online services. This also relates to any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

## Contact for marketing purposes?

Acorn Independence will only send you marketing emails where you have agreed to this.

We offer regular emails and bulletins to let you know about Acorn Independence news and services.

We may personalise the message content based upon any information you have provided to us previously and your business type.

# WILL Acorn Independence SHARE MY PERSONAL INFORMATION WITH ANYONE ELSE?

We will keep your information within Acorn Independence except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies) or as described in this section and the section concerning Offensive or Inappropriate Content.

Generally, we will use your information within Acorn Independence and will only share it outside Acorn Independence where you have requested it or given your consent. Sometimes Acorn Independence uses third parties to process your information on our behalf, for example to provide analysis. Acorn Independence requires these third parties to comply strictly with its instructions and Acorn Independence requires that they do not use your personal information for their own business purposes, unless you have explicitly consented to the use of your personal information in this way.

# OFFENSIVE OR INAPPROPRIATE CONTENT SENT TO Acorn Independence

If you post or send content which may reasonably be deemed to be offensive, inappropriate or objectionable anywhere on or to Acorn Independence websites, social media or communications channels, Acorn Independence may remove such content.

Where Acorn Independence reasonably believes that you are or may be in breach of any applicable laws, for example on hate speech, Acorn Independence may disclose your personal information to relevant third parties, including to law enforcement agencies or your internet provider. Acorn Independence would only do so in circumstances where such disclosure is permitted under applicable laws, including data protection law.

# WHAT IF I AM AGED UNDER 18?

If you are aged 18 or under, please get your parent or guardian’s permission before you submit any personal information to Acorn Independence when using our website and online services. This also relates to any personal information you provide to us by phone, SMS, email, in letters and other correspondence and in person.

# HOW LONG WILL Acorn Independence KEEP MY INFORMATION?

We will hold your personal information on our systems for as long as is necessary for undertaking of the relevant activity, or as long as is set out in any relevant contract you hold with Acorn Independence.

# CAN I REQUEST THAT MY DATA BE DELETED?

Please see the section on finding out what data Acorn Independence holds about you.

# CAN I FIND OUT WHAT DATA Acorn Independence HOLDS ABOUT ME?

Under the Data Protection Act/General Data Protection Regulation you have the right to request a copy of the personal information Acorn Independence holds about you and to have any inaccuracies corrected or your data deleted. We require you to prove your identity with 2 pieces of approved identification. We will use reasonable efforts consistent with our legal duty to supply, correct or delete personal information about you on our files. Please address requests and questions about this or any other question about this Privacy and Cookies Policy to the Data Manager, Acorn Independence, address (Email:).

We will need two copies of forms of identification, which can be:

Passport

Driving licence

Birth certificate

Utility bill (from last 3 months)

Current vehicle registration document

Bank statement (from last 3 months).

# COOKIES

## What is a Cookie?

A cookie is a small amount of data, which often includes a unique identifier that is sent to your computer, tablet or mobile phone (all referred to here as a "device") web browser from a website's computer and is stored on your device's hard drive. Each website can send its own cookie to your web browser if your browser's preferences allow it. Many websites do this whenever a user visits their website in order to track online traffic flows. Similar technologies are also often used within emails to understand whether the email has been read or if any links have been clicked. If you continue without changing your settings, we’ll assume that you are happy to receive all cookies on the Acorn Independence] website. However, you can change your cookie settings at any time. Please note that cookies can't harm your computer. We don't store personally identifiable information in cookies we create, but we do use encrypted information gathered from them to help improve your experience of the site. For example, they help us to identify and resolve errors. During the course of any visit to the Acorn Independence website, the pages you see, along with a cookie, are downloaded to your device. Many websites do this, because cookies enable website publishers to do useful things like find out whether the device (and probably its user) has visited the website before. This is done on a repeat visit by checking to see, and finding, the cookie left there on the last visit.

## How does Acorn Independence use cookies?

Information supplied by cookies can help us to understand the profile of our visitors and help us to provide you with a better user experience. For example, if on a previous visit you went to our Courses pages, we might find this out from your cookie and relevant information on your second and subsequent visits. Acorn Independence uses this type of information to help improve the services it provides to its users.

Please note that during your visits to Acorn Independence websites you may notice some cookies that are not related to Acorn Independence or our contractors.

To enhance the user experience, we sometimes embed content from social media and other third party websites. These may include YouTube, Twitter, Facebook, SoundCloud, Vine, Instagram, Pinterest and Flickr. As a result, when you visit a page containing such content, you may be presented with cookies from these websites and these third party cookies may track your use of the Acorn Independence website. Acorn Independence does not control the dissemination of these cookies and you should check the relevant third party's website for more information. If you continue without changing your settings, we'll assume that you are happy to receive all cookies on the Acorn Independence website.

Where Acorn Independence embeds content from social media and other third-party websites, some websites may use Google Analytics to collect data about user behaviour for their own purposes. Acorn Independence does not control this. For more information, see the Google webpage “How Google uses data when you use our partners’ sites or apps”.

## Other information collected from web browsers

Your web browser may also provide Acorn Independence with information about your device, such as an IP address and details about the browser that you are using. We use information provided by your browser or by the link that you have clicked to understand the webpage that directed you to Acorn Independence and this may be captured by performance cookies.

If you have any concerns about the way that we use cookies or respect your settings, then please contact Alasdair.cameron@sampsonhall.co.uk

# DO NOT TRACK BROWSER SETTINGS

Do not track (DNT) is a feature offered by some browsers, with some newer browsers offering it as default. If you enable it, it sends a signal to websites to request that your browsing isn't tracked, for example by third party ad or social networks, or analytic companies. At present no industry-wide uniform standard has been agreed and adopted to determine how DNT requests should be managed, so our website doesn’t currently respond to DNT requests. Until that standard is established, we'll continue to review DNT and other new technologies, but won't respond to DNT requests. We're giving you this information to comply with recent legislation, and to ensure that we are honest and clear about your privacy when using our website. We know you'd expect nothing less from us, and please be assured that we're working on a number of other privacy and cookie-related improvements to the website.

# CHANGES TO Acorn Independence’s PRIVACY AND COOKIES NOTICE

This Privacy and Cookies Notice may be updated from time to time so you may wish to check it each time you submit personal information to Acorn Independence. The date of the most recent revisions will appear on this page. If you do not agree to these changes, please do not continue to use the Acorn Independence] websites to submit personal information to us. If material changes are made to the Privacy and Cookies Notice, for instance affecting how we would like to use your personal information, we will provide a more prominent notice (including, for certain services, email notification of Privacy Notice changes).

# CONTACTING Acorn Independence ABOUT THIS PRIVACY AND COOKIES NOTICE

If you any questions or comments about this Privacy and Cookies Notice please contact:

Sampson Hall

Alasdair.Cameron@sampsonhall.co.uk