PRIVACY NOTICE

KiCK
TRANSFORMING LIVES

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1. INTRODUCTION

KICK LTD. ("KICK"), is a company limited by guarantee, registered in England and Wales no. 4831571 and a registered charity no. 1100072, and is registered with the Information Commissioner's Office (registration number: ZC107380).

This privacy notice is issued on behalf of KICK, so when we mention KICK, "We", "Us" or "Our" in this privacy notice, we are referring to the organisation responsible for processing your data.

KICK values your privacy and is determined to protect your personal data. The purpose of this privacy notice is to inform you as to how we look after your personal data. We'll also tell you about your privacy rights.

Our Site is owned and operated by KICK whose registered address is:

Holy Trinity Church Centre
Sheen Park
RICHMOND
TW9 1UP

The Trustees are the data controllers, and the executive Senior Leadership Team is responsible for data protection and complaints arising concerning day-to-day matters.

Queries related to Data Protection should be directed to the Data Protection Lead (see the section "How to Contact Us")

2. PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and process your personal data, which you have either provided to us, we obtain or that we collect from third parties. It sets out:

- What personal data we collect;
- How We use your data;
- Direct Marketing
- Lawful basis;
- How do we store and how long do we keep your data?
- How your information is protected;
- Who we share your information with;
- International transfers;
- Cookies;
- Summary of your rights;
- How to Contact Us;
- How to Complain.

This website is not intended for children, and we do not knowingly collect data relating to children.

THIRD-PARTY LINKS OUTSIDE OF OUR CONTROL

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 notice of every website you visit.

3. THE PERSONAL DATA WE COLLECT

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioner's Office.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped as follows:

- Identity Data, which includes first name, surname, username, title, date of birth, gender.
- Contact Data which includes telephone number/s, email address, billing address.
- Financial Data, which includes bank account number, sort code, if purchasing services from us or if donating to us.
- Technical Data includes IP address, browser type and version, location, operating system, and other technology on the devices you use to access this website.
- 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, your communication preferences.
- Request a call back or enquire on our website
- Media, including photos and videos
- Otherwise interact with Us or provide information to a third party to be referred to Us.
- Special Category data, including allergies, intolerances, or health or medical conditions, including special needs.
- Compliments, complaints, accidents and incidents information.

We will collect data you give us when applying for a job or volunteering with Us, this may include:

- Your bank account details, tax, and residency status.
- References from previous employers or educational institutions.
- Contact details for you, and any next of kin.
- Qualifications.
- Information concerning your health and medical conditions.
- Information about your race, ethnicity, and sexual orientation.

A privacy statement for job applicants is included in the recruitment pack.

SPECIAL CATEGORY DATA

Where data processing relates to Special Categories of Data, the following processing conditions apply:

- The data subject has given Explicit Consent.
- Processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement.

Social Media Users

We use social media channels (including Facebook, Instagram, LinkedIn, WhatsApp, YouTube and, the "Social Media Companies") to publish information about Us. If you follow or otherwise engage with our social media channels, we will collect Usage Data to analyse how users interact with those channels. If you use social media to send us messages or posts, we may use your Profile Data to communicate with you. When you interact with our channels, the Social Media Companies will also process your personal data for the purposes set out above as joint controllers. For more information, we would encourage you to review the privacy notices published by the Social Media Companies.

4. HOW WE USE YOUR DATA

We use your data to provide the best possible products and services.

This includes:

- Providing and managing your access to Our Site.
- To process, manage and keep a record of your bookings.
- To process credit and debit card payments you make.
- To send you marketing information.
- Personalising and tailoring your experience on Our Site.
- Supplying our products and services to you.
- Responding to communications from you.
- Analysing your use of Our Site and gathering feedback to enable Us to improve Our Site and your user experience continually.
- Meeting our obligations to our customers.
- Creation and storage of legal documents in compliance with accounting standards.
- To enable us to communicate with you ahead of your arrival with relevant news and updates.
- Administer customer satisfaction and feedback surveys.

Third parties or publicly available sources.

We may receive personal data about you from various third parties and public sources as set out below:

- Analytics providers such as Google.
- Search information providers such as Google.
- Contact, Financial and Transaction Data from providers of technical and payment services.
- Identity and Contact Data from publicly available sources such as Experian.
- Social Media sites such as Facebook, Instagram, LinkedIn, WhatsApp and YouTube.

5. DIRECT MARKETING

"Under the new Data (Use and Access) Act 2025 (DUAA), we can send you electronic mail (emails, texts, social media messages) about our charitable purposes and ways you can support us if you have previously shown interest or offered support to our charity.

Your choices and rights: When you provide your details, we will always give you a clear and straightforward way to say 'no' to marketing. Every message we send will also include an easy way to opt out (e.g., an unsubscribe link). You can stop receiving these communications at any time by following the opt-out instructions or contacting us."

We will not, however, send you any unsolicited marketing or spam, and we will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the DPA 2018, the GDPR, and the Privacy and Electronic Communications Regulations 2003.

6. DONATIONS

What data do we collect about you?

- Your name.
- Contact address(es).
- Telephone number(s).
- Email address(s).
- Records of your communications with us.
- Donation and Gift Aid information.
- Bank details when you set up a Direct Debit.
- Information you may provide on our website, such as the reason for donating.

HOW DO WE USE THE DATA WE COLLECT ABOUT YOU?

We use your personal data for several purposes, including the following:

- To keep a record of donations you make, actions you take, and our communications with you.
- To process credit and debit card donations you make.
- To process your direct debit payments, you make.
- To claim gift aid on your donations via HMRC.
- To send you marketing information about our work and fundraising activities
- To comply with applicable law and regulations.

ETHICAL SCREENING AND MINIMISING RISK

To comply with our obligations as a charity, we must also take reasonable and appropriate steps to identify our donors, particularly when significant sums are donated.

Using charity law as the legal basis for processing, we may conduct due diligence to ensure that donations and support come from appropriate sources. This is to safeguard our reputation and mitigate any associated risks. We have clearly defined principles that guide how we engage in mutually beneficial relationships with companies, foundations and individuals.

These principles ensure that we raise money legally, safely and transparently. The nature and extent of due diligence research are proportionate to the fundraising opportunity. This doesn't mean we'll research extensive personal details about every donor or ask about every donation.

Any information we collect for these purposes will be limited to what is necessary to meet these requirements and will be processed in line with your rights.

7. LAWFUL BASIS

Under the UK's GDPR, we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following bases applies:

You have given consent and explicit consent to the processing of your personal data for one or more specific purposes as listed below:

- Marketing Material.
- Applying for a Job.
- Special Category data.
- Submitting Special Category data so that we can tailor our services to you including allergies, intolerances, or health or medical conditions, including special needs.

Processing is necessary for the performance of a contract to which you are a party or to take steps at your request before entering a contract, as listed below:

- Employment.
- Send you communications about service you have purchased from Us or donations.
- Send you communications about changes to our services or our terms and conditions.
- To help Us recover any debts that may be owed to Us by you.
- Processing is necessary for compliance with a legal obligation to which we are subject, as listed below:
- Employment, including the right to work.
- To provide the legal and regulatory authorities with specific information they appropriately request from us within their legal authority, and to help ensure we are combating Fraud and Financial Crime.
- Capture information about health and safety incidents.
- Send you communications about changes to our services or our terms and conditions.
- To help Us recover any debts that may be owed to Us by you.

Processing is necessary for the purposes of our legitimate interests or those of a third party, except where those interests are overridden by the data subject's fundamental rights and freedoms, which require the protection of personal data.

We rely on our legitimate interests for the following reasons:

- Keeping our records up to date.
- Communicating with you under the DUAA 2025.
- Running our websites and keeping them safe and secure.
- Presenting our content and communications most effectively and sustainably for you and your devices.
- Measuring how you use our websites and improving their content and accessibility.
- Complying with legal and or regulatory requirements.
- To help us or medical or emergency services to follow up or assist with any medical or health event, accident or injury.
- To help ensure you can feed back to us essential information about your experiences as our customer, so we can resolve challenges and improve our services
- Processing complaints and enquiries.

8. HOW WE STORE YOUR DATA AND HOW LONG WE KEEP IT

Personal data that we process for any purpose, or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Our retention of your personal data is linked to your actions. Unless a more extended retention period is required or permitted by law, we will only hold your Personal Information on our systems for the period necessary to fulfil the purposes outlined in this Notice, or until you request that the information be deleted (see the section “Summary of Your rights").

Please request our Retention Policy (DP03) for a detailed list of our retention periods.

Even if we delete your Personal Information, we reserve the right to retain your personal data where such retention is necessary for compliance with a Statutory obligation (for example, to maintain a copy for legal, tax or regulatory purposes). Still, in such an event, we will do so only as long as necessary to fulfil those Statutory obligations.

9. DATA SECURITY

We are committed to not sharing your data. We will only do this if it is in your legitimate interest to ensure we provide you with the support and information you need to make an informed decision about the service(s) or product(s).

We will not sell your data to any unconnected third parties.

We may contract with third parties to supply products and services to you on our behalf. These may include payment processing and search engine facilities.

We might share your information across different parts of our organisation for research and analysis.

In some cases, third parties may require access to some or all of your data. Where any of your data is necessary for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

We currently contract with:

Third-party name	**Used for**	**Privacy notice**
Airtable	Marketing, customer and other contacts information	https://www.airtable.com/company/privacy
BrightHR	HR and employee data	https://www.brighthr.com/terms/?tab=privacy
Google	Document storage and email correspondence	https://policies.google.com/privacy
Mailchimp	eNewsletters	https://www.intuit.com/privacy/statement/
MS365	Documentation creation	https://privacy.microsoft.com/en-gb/privacystatement
Stewardship	Donations	https://www.stewardship.org.uk/transparency/privacy
XERO	Accounts	https://www.xero.com/uk/legal/privacy/

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

- External Third Parties Service
- Providers based in the UK who provide IT and system administration services.
- Professional advisers, including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the UK who require reporting of processing activities in certain circumstances.
- 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 our business changes, the new owners may use your personal data in the same way as set out in this privacy notice.
- 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; they may only process it for specified purposes and in accordance with our instructions.

10. INTERNATIONAL TRANSFERS

We may need to transfer some personal data to third parties described above that are located outside the UK. In such cases, we will take appropriate measures to ensure your personal data remains protected. If the organisation is based outside the UK and in a country not covered by an adequacy decision (which provides an adequate level of data protection), we will implement appropriate safeguards, such as the ICO's International Data Transfer Agreement (IDTA).

If you have any questions or need more information regarding international transfers of your personal data, please get in touch with us (see the section on How to Contact Us)

11. AUTOMATIC COLLECTION, COOKIES AND AGGREGATE INFORMATION COLLECTED FROM OUR WESBITE

We automatically collect some data from visitors to our websites. This includes which pages you have viewed, how long you have viewed them, and where you go on our website.

We use cookies to store information about how you use our sites. A cookie is a piece of data stored on a user's computer that remembers information about you and creates a profile of your viewing preferences. Your profile is used to tailor your experience on our website, make navigation easier, and direct you to information that best matches your interests. We require your consent to place non-essential cookies on your device. You can change your cookie preferences when accessing our website. Further details can be found in our Cookies Policy.

Information is also collected about how you arrived at our websites. This includes what links or adverts of ours you have viewed or clicked on to reach us, or any search terms you have used. Where you see an advert outside of our website, we may place a cookie on your browser. This is so that, when you access our website, we recognise that you have seen an advert of Ours elsewhere. If you have logged in, your login details are included.

Aggregate information is collected from users using our own web tracker. This information includes users' Anonymised Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time of visit, number of clicks, error pages, and number of unique visits. This information is not linked to personal profiles or personally identifiable information provided by users. We use the information to analyse visitor trends and website usage, administer the website, and gather broad demographic information about our website users.

We may use the information we receive and/or collect about you to:

- Fulfil our obligations under any contract that we have entered into with you or with a Resident that you represent, and to provide you or the relevant Resident with information or services that you or the Resident has requested .
- Monitor website usage and provide statistics to third parties for the purposes of improving and developing the website and the services we provide via the website.
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12. SUMMARY OF YOUR RIGHTS

As a data subject, you have several rights and control over how your data is used.

- You can request access to, deletion of, or correction of, your personal data held by Us.
- You can ask for a copy of the data you have given us.
- You can require us to amend or change incorrect or incomplete data.
- You can require us to delete or stop processing your data, where the data is no longer necessary for processing.
- You can object to the processing of your data where we are relying on its legitimate interests as the legal ground for processing.
- You can ask us to stop processing data for a period if the data is inaccurate or there is a dispute about whether your interests override the company's legitimate grounds for processing data.

To enforce any of the foregoing rights or if you have any other questions about Our Site or this Privacy Notice, please get in touch with Us using the details set out in the section “How to Contact Us”.

No fee is required, except in some cases. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to confirm your identity and ensure your right to access your personal data (or to exercise any 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 request further information regarding your request to expedite our response.

We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made multiple requests. In this case, we will notify you and keep you updated.

13. CONTACT US

If you have any questions about Our Site or this Privacy Notice, please get in touch with us by email at:

data@kick.org.uk

or by post:

Data Protection Lead
Holy Trinity Church Centre
Sheen Park
RICHMOND
TW9 1UP

Please ensure that your query is clear, particularly if it is a request for information about the data that we hold about you.

14. COMPLAINTS

If you have any complaints about how we handle your data, please contact us (see the section above).

If this does not resolve your complaint to your satisfaction, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom. The contact details for the Information Commissioner's Office are:

Telephone: 0303 123 1113 Website: https://ico.org.uk/concerns/.

15. CHANGES TO OUR PRIVACY NOTICE

We may change this Privacy Notice as we deem necessary from time to time, or as required by English law. Any changes will be immediately posted on Our Site, and you will be deemed to have accepted the terms of the Privacy Notice on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up to date.

16. DOCUMENT CONTROL

Owner:	Data Protection Lead
Document Reference:	DP16
Version:	1.0
Review Committees:	GRC
Date last reviewed:	-
Approval Committee:	Board
Date approved by the Trustees:	16/11/2026
Period (& date of next review):	Every three years (November 2029)

Change Log			
Date	Version	Action	Amendments
12/10/2026	1.0	Redrafted by COO as DPL for the new website.	Fully revised policy