



# Data Protection – Privacy Notice

## **About Us**

We Phoenix Spiritual Group LLP trading as Phoenix, The Phoenix and The Phoenix Spiritual Group (also referred to as “we”, “us”, or “our”) are a registered Limited Liability Partnership in England (No. OC420572). Our registered address is 27 Paddick Drive, Reading. RG6 4HF.

## **The Purpose Of This Notice**

This Notice is designed to help you understand what kind of information we collect in connection with our services and how we will process and use this information. In the course of providing you with services, we will collect and process information that is commonly known as personal data.

**This Notice describes how we collect, use, share, retain and safeguard personal data. It sets out your individual rights; we explain these later but in summary these rights include your right to know what data is held about you, how this data is processed and how you can place restrictions on the use of your data.**

## **What Is Personal Data?**

Personal data is information which, by itself or with other data available, can be used to identify a natural person. Examples include an individual's name and contact details.

Personal data may contain information which is known as special categories of personal data. This may be information relating to and not limited to, an individual's health, racial or ethnic origin, religious or philosophical beliefs, or data relating to sexual orientation.

## **Personal Data We Collect**

In order for us to provide services, we will collect and process personal data about you. We will also collect your personal data when you request information relating to our services.

We may also need to collect personal data relating to others in order to provide our services. In most circumstances, you or someone representing you will provide us with this information. Where you disclose the personal data of others, you must ensure you are entitled to do so.

You may provide us with personal data when completing paper based documents or we complete a document in conjunction with you; when you contact us via the telephone; by email; social media or when writing to us directly.

We may share some personal data (for example your name) with appropriate and relevant parties (for example a medium on whose course you have booked).

We will collect your personal data when you visit our website, where we will collect your unique online electronic identifier; this is commonly known as an IP address. We will also collect electronic personal data when you first visit our website where we will place a small text file that is commonly known as a cookie on your computer. Cookies are used to identify visitors and to simplify accessibility, and to monitor visitor behaviour when viewing website content, navigating our website and when using features.

Where we collect data directly from you, we are considered to be the controller of that data i.e. we are the data controller. If we were to use third parties to process your data, these parties would be known as processors of your personal data.

A data 'controller' means the individual or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data.

A data 'processor' means the individual or organisation which processes personal data on behalf of the controller.

As a provider of services, we will process the following categories of data:

- Personal data such as an individual's name & contact details
- Special categories of personal data such as dietary requirements

If you object to the collection, sharing and use of your personal data we may be unable to provide you with our services.

For the purposes of meeting the Data Protection Act 2018 territorial scope requirements, the United Kingdom is identified as the named territory where the processing of personal data takes place.

### **Why Do We Need To Use Your Personal Data: The Legal Basis And Purposes?**

We will use your personal data for the **performance of our contract** with you; to provide you with our services; to administer the service you use; to update our business records; to respond to any requests from you about our services and to process complaints. We will also use your personal data to comply with our own **legal obligations** and **for our own legitimate interests** in managing your relationship with us; perform statistical analysis on the data we collect; for financial planning and business forecasting purposes; and to develop new services.

We will use the special category data we collect about you for the **performance of our contract** with you which is deemed to be necessary for reasons of protecting your **vital interests**, for reason of **public interest** or **legal obligation**. This allows us to provide our services and administer them appropriately.

In using our services you should understand that you are forming a contract with us. If you contact us to request details on the services we provide, we consider ourselves as having a **legitimate business interest** to provide you with further information about our services. You may request to be withdrawn from all such marketing activities at any time.

In some situations we may request your **consent** to use your data in order to provide you with and administer your services; to share your data or to transfer your data outside the European Economic Area. Where we require consent, your rights and what you are consenting to will be clearly communicated to you. Where you provide consent, you can withdraw this at any time by contacting us.

### **Data Retention**

We will retain your personal data at the end of any contractual agreement for no less than 3 years. We do so to ensure that appropriate data is available should it be required in the investigation of any incident giving rise to an insurance claim.

- The retaining of data is necessary where required for contractual, legal or regulatory purposes or for our legitimate business interests for statistical analysis and service development and marketing purposes.
- Sometimes we may need to retain your data for longer, for example if we are representing you or defending ourselves in a legal dispute or as required by law or where evidence exists that a future claim may occur.

### **International Transfers Of Personal Data**

We do not transfer or hold data outside of the European Economic Area (EEA).

### **Your Rights**

Individuals are provided with legal rights governing the use of their personal data. These grant individuals the right to understand what personal data relating to them is held, for what purpose, how it is collected and used, with whom it is shared, where it is located, to object to its processing, to have the data corrected if inaccurate, to take copies of the data and to place restrictions on its processing. Individuals can also request the deletion of their personal data.

These rights are known as Individual Rights under the Data Protection Act 2018. The following list details these rights:

- The **right to be informed** about the personal data being processed;
- The **right of access** to your personal data;
- The **right to object** to the processing of your personal data;
- The **right to restrict** the processing of your personal data;
- The **right to rectification** of your personal data;
- The **right to erasure** of your personal data;
- The **right to data portability** (to receive an electronic copy of your personal data);
- Rights relating to automated decision making including profiling.

Individuals can exercise their Individual Rights at any time. As mandated by law we will not charge a fee to process these requests, however if your request is considered to be repetitive, wholly unfounded and/or excessive, we are entitled to charge a reasonable administration fee.

In exercising your Individual Rights, you should understand that in some situations we may be unable to fully meet your request, for example if you make a request for us to delete all your personal data, we may be required to retain some data for taxation, prevention of crime and other statutory purposes.

You should understand that when exercising your rights, a substantial public or vital interest may take precedence over any request you make. In addition, where these interests apply, we are required by law to grant access to this data for law enforcement, legal and/or health related matters.

### **Protecting Your Data**

We will take all appropriate technical and organisational steps to protect the confidentiality, integrity, availability and authenticity of your data, including when sharing your data within the Partnership and authorised third parties.

### **How To Contact Us**

Please contact us in writing to The Partners, Phoenix Spiritual Group LLP, 27 Paddick Drive, Lower Earley RG6 4HF or by e-mailing [adean@spiritualgroup.uk](mailto:adean@spiritualgroup.uk) if you:

- require more information about our services;
- have any questions regarding this Notice and your Individual Rights;
- need further details on the use or the retention of your data, how we collect personal data and with whom we share data;
- have any questions relating to the use of, or object to the use of, your data;
- wish to exercise your Individual Rights;
- wish to opt out of receiving marketing services.

### **Complaints**

If you are dissatisfied with any aspect of the way in which we process your personal data please contact us in writing to The Partners, Phoenix Spiritual Group LLP, 27 Paddick Drive, Lower Earley RG6 4HF or by e-mailing [adean@spiritualgroup.uk](mailto:adean@spiritualgroup.uk)

You also have the right to complain to the UK's data protection supervisory authority, the Information Commissioner's Office (ICO). The ICO may be contacted via its website which is <https://ico.org.uk/concerns/>, by [live chat](#) or by calling their helpline on 0303 123 1113.

Phoenix Spiritual Group LLP is registered with the UK Information Commissioner, registration number ZA340831.