



## **General Data Protection Regulation Statement and Policy (Privacy Policy)**

Step Change Studios is committed to protecting the privacy of our beneficiaries and supporters and to upholding the highest standards of care with regard to any personal data in our possession.

The UK's first Data Protection Act was passed in 1984 and the second Act was passed in 1998, coming into force on 1 March 2000. The General Data Protection Regulation (GDPR) was passed in 2016 and came into force after a two-year preparation period on 25 May 2018. GDPR originated in the European Parliament but will be fully absorbed into UK law regardless of the UK's exit from the European Union. The regulation will apply across all EU member states including the Republic of Ireland, where it replaces the Acts of 1988 and 2003.

We generally hold very little personal data – only that which we need to carry out our work – and we do not engage in any direct marketing programmes such as telephone fundraising or donation fundraising campaigns. We do not share personal data with third party organisations apart from trusted partners who are GDPR compliant such as our funding partners who support, monitor and evaluate our work.

### **Why we hold and process personal data**

Our work requires us to collect certain data from those participating in, and supporting our activities and events. We do this in order to:

- Monitor and evaluate our programmes, enabling us to continually improve them to better meet participants' needs
- Provide impact reports to funders and potential funders, without whom we could not resource the programmes
- Help us plan future programmes, sessions, events & other related activities.
- Keep a record of funding provided and actions taken by our supporters and our communications with them
- Send our supporters information about our activities and events where we have their consent or are otherwise allowed to
- Keep people safe during our activities and events
- Comply with legal obligations
- Manage our organisation
- Ensure we do not send unwanted information to participants, supporters or anyone who has informed us they do not wish to be contacted.

These reasons are underpinned by a "legal basis" under GDPR.

## **Explaining the legal bases we rely on**

The law on data protection sets out a number of different reasons for organisations to collect and process your personal data: When collecting your personal data, we will always make clear to you which data is necessary for a particular purpose.

Step Change Studios relies on the following legal bases in our marketing activities:

### *Consent*

Wherever possible, we will ask for your consent to send you marketing information. We will do this through a clear statement of what you will receive and allow you to select only those channels that you wish to hear from us by.

For example, if you register for a dance programme, you will be asked whether you would like us to keep in touch about other Step Change Studios' activities and events. You will also be asked which channel(s) of communication you would like us to use.

### *Legitimate interest*

In specific situations, we process your data to pursue our legitimate interests in ways which might reasonably be expected and which do not materially impact your rights, freedom or interests. Step Change Studios' use of legitimate interest includes the following:

- Sending direct marketing information by email, to keep our participants and supporters updated on Step Change Studios' activities and events. We will only do this where we have reason to believe that this information will be of interest. We make it easy for you to opt out of receiving such information.
- If you have opted in to Step Change Studios' emails or text messages we may link to your account on social media site such as Twitter and Instagram in order to serve you Step Change Studios' content.
- We review your previous participation in, or support of Step Change Studios in order to offer relevant information in the future.
- To help identify businesses and organisations who may wish to support Step Change Studios, we send emails or make phonecalls to individuals where relevant to their job, for instance people working in the arts, and disability sector.

For activities other than marketing, we may rely on different legal bases:

### *Legal compliance*

If the law requires us to, we may need to collect and process your data.

### *Consent*

We may ask for your consent for data.

For example, where you engage with a dance programme and can give you a clear choice about what information you need to provide.

### *Legitimate Interest*

In many situations we need data in order to carry out a task.

For example, if you register for a dance activity or event.

### *Public Interest*

In limited situations we may use data in the public interest. It is likely to be in the public interest to collect data to prevent crime or dishonesty, ensure that we are fair in our practices by carrying out equality and diversity monitoring, or safeguard the wellbeing of people with whom we work.

## **When and why we will send you personalised marketing communications**

Step Change Studios will only contact you for marketing purposes - for example keep you up to date on our work, or let you know of ways in which you can participate or support that work - where we have your consent or we are otherwise allowed to do so.

We will make it easy for you to tell us if you would like to receive marketing communications from us and hear more about our work and the ways in which you would like to receive this information (such as email, SMS and phone). We will not send you marketing material if you tell us that you do not wish to receive it.

Where you give us your consent to send marketing information, we will wherever possible let you know how long this consent will last. Unless we have grounds for believing that a longer period is reasonable and have explained this to you, we will understand your consent to last for 36 months. After this time, in order for us to continue to update you, we will need your refreshed consent. You can update or withdraw your consent at any time, for individual channels of communication, or for all channels.

## **Other circumstances in which you may receive marketing information**

### *"Legitimate Interest"*

We may send you marketing communications by direct mail where you are a regular participant or supporter and we have evidence that you do not object to receiving marketing material and you have not informed us you wish to opt-out of receiving marketing communication from us.

### *"Soft opt in"*

This allows organisations to send marketing communications by email and SMS to individuals who have previously received similar services, provided they were given the opportunity to opt out at the time of registering for the initial service.

## **How and when we collect information about you**

Step Change Studios may collect your personal data in the following circumstances:

### *When you give it to us DIRECTLY*

You may give us your personal data directly when you sign up for one of our activities or events, volunteer with us, or when you communicate with us.

### *When you give it to us INDIRECTLY*

You may give us your information indirectly when you sign up to events with third parties that are funding or supporting us to deliver an event or activity. These independent third parties will pass your data to Step Change Studios where you have given your consent or it is a necessary part of providing the event or activity.

Sometimes your personal data is collected by an organisation working on our behalf but as they are acting on our behalf we are the "data controller" and responsible for the security and proper processing of that data.

### *When you access Step Change Studios' Social Media*

We might also obtain your personal data through your use of social media such as WhatsApp, Twitter, Instagram or LinkedIn, depending on your settings or the privacy policies of these social media and messaging services. To change your settings on these services, please refer to their privacy notices, which will tell you how to do this.

<https://www.facebook.com/policy.php>

<https://twitter.com/en/privacy>

<https://www.whatsapp.com/legal/#privacy-policy>

<https://help.instagram.com/402411646841720>

<https://www.linkedin.com/legal/privacy-policy>

### *When the information is publicly available*

We might also obtain personal data about individuals who may be interested in participating in or supporting organisations like Step Change Studios. In this scenario, Step Change Studios' may seek to find out more about these individuals, their interests and motivations for supporting us through publicly available information. This information may include newspaper or other media coverage, open postings on social media sites such as LinkedIn and data from Companies House. Step Change Studios will not retain publicly available data relating to such individuals without their consent.

We may also gather information if your activities relate to our work - for instance, if you are a public figure such as a Member of Parliament or you represent an organisation which we work with we may gather information about you in order to make decisions - for instance, whether we engage with you to seek your support for our work.

### *Step Change Studios' use of cookies*

Cookies are used to enable us to improve services for you through, for example measuring how many people are using each page of the website and for how long so that we can try to improve the quality of our website.

When you visit our web site we will collect data from your computer or other device such as a smart phone or tablet through the use of "cookies". Cookies are created by

your web browser when you visit our website. Every time you go back to the Step Change Studios' website, your browser will send the cookie file back to the website's server. They improve your experience of using our website, for example, by remembering your preference settings so that you are presented with information likely to be most relevant to you, and by measuring your use of the website to enable us to continuously improve our website to ensure that it meets your needs. Cookies can also be used to show you relevant Step Change Studios' content on social media services such as Twitter - these are known as "retargeting" or "advertising" cookies.

If you wish to restrict or block the cookies which are set by the Step Change Studios' website, or indeed any other website, you can do this through your browser settings. The Help function within your browser should tell you how.

Alternatively, you may wish to visit [www.aboutcookies.org](http://www.aboutcookies.org) which contains comprehensive information on how to do this on a wide variety of browsers. You will also find details on how to delete cookies from your computer as well as more general information about cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

If you visit our website as an anonymous visitor (e.g. you switch off cookies), Step Change Studios may still collect certain information from your browser, such as the IP address (an IP address is a number that can uniquely identify a computer or other internet device).

The Step Change Studios' website contains hyperlinks to websites owned and operated by other organisations. These third party websites have their own privacy policies, including policies on their use of cookies, and we urge you to review them. They will govern the use of personal information you submit or which is collected by cookies whilst visiting these websites. We cannot 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.

Please be aware that restricting cookies may impact on the functionality of the Step Chang Studios' website.

### *Google Analytics*

Step Change Studios' uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of the website and compile reports for us on activity on the site.

Google stores the information collected by the cookie on servers in the United States of America. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. By using the Step Chang Studios' website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

### **What information might Step Change Studios' collect about you?**

We only collect personal data relevant to the type of interaction you have with Step Change Studios.

Whatever your interaction with us this information will be minimal and linked to the purpose for which we need it.

For example, when you contact Step Change Studios to register for an activity or event, or sign up to Step Change Studios' online content or you telephone, email, write to or text Step Change Studios, or engage with Step Change Studios via social media channels, we may receive and retain personal information.

In these cases we are likely to process details such as your name, email address, postal address, telephone or mobile number.

If you participate in an activity or event we may (with your permission) take your photograph or video, or interview you.

If you participate in market research, we may ask you questions regarding your experience with us, or other survey questions relating to your experience.

If you are a volunteer, we may collect information such as correspondence with you, the activities and events you attend, details of your background or how we would like to work with you.

Where we gather information about you which is publicly available - for instance as a funder - this may include your name, contact details, views and interests.

### *Sensitive Personal Data*

We only collect "sensitive personal data", e.g. health status, where there is a clear and specific reason for doing so, such as participation in an event or activity, or volunteering or working with Step Change Studios. We may also collect data for equality monitoring.

We collect this data where we need it to ensure that we provide appropriate facilities or support to enable you to participate in the activity or event or carry out your role, and where required to collect such data as a condition of third party funding, such as publicly funded grants.

Rarely, we may collect this data for the prevention of crime or dishonesty, to safeguard those with whom we work, or for another reason which is in the public interest. Where we do this we will do it carefully and in accordance with applicable laws.

All sensitive personal data is stored safely on a database, to which only a limited number of relevant staff have access. It is deleted when no longer relevant, is never shared with third parties, and is available to you at any point should you wish to see it.

### **How will Step Change Studios use your personal data?**

Step Change Studios will use your personal information for the following purposes:

*For administrative reasons, including:*

- "service administration", which means that Step Change Studios' may contact you for reasons related to administering any activities, events or online content you have signed up for;
- to confirm receipt of any payments or registration material (unless you have asked us not to do this);
- in relation to correspondence you have entered into with us whether by letter, email, text, social media, message board or any other means, and to contact you about any content you provide;
- for internal record keeping so as to keep a record of your relationship with us;
- to fulfil agreements you have entered into with Step Change Studios;
- to provide logistical information to people who are taking part in Step Change Studios' activities and events;
- to communicate with Step Change Studios' volunteers;
- to implement any instructions you give us to with regard to withdrawing consent to send marketing information;
- to use IP addresses to identify the location of users, to block disruptive use and to establish the number of visits from different countries;
- to protect our team and those with whom we work, or to prevent crime and dishonesty.

*For marketing and fundraising reasons*

*For market research*

- to invite you to participate in surveys or research about our work;
- to analyse and improve the activities, events and online content offered by the Step Change Studios. We may also use and disclose information in aggregate (so that no individuals are identified) for marketing and strategic development purposes.

*Job applicants*

If you apply to work for Step Change Studios we will only use the information you give us to process your application or to monitor recruitment statistics on an unidentified basis. If we want to disclose information to someone outside Step Change Studios, for example, if we need a reference from your previous employer, we will tell you beforehand. The only exception is where the law obliges us to disclose information to a third party (such as the police) and we are not allowed to tell you.

If you are unsuccessful in your application, we may hold your personal information after we've finished recruiting for the role you applied for, for up to 12 months to deal with any follow up queries or issues.

If you commence working with the Step Change Studios, your personal information will be processed in accordance with your appointment contract and other applicable policies we have from time to time.

## **Will Step Change Studios share your personal information with anyone else?**

We will only use your information within Step Change Studios for the purposes for which it was obtained. Step Change Studios will not, under any circumstances, share or sell your personal data with any third party for their own marketing purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us.

### ***Step Change Studios partners and funders***

We may need to share your information with organisations that support Step Change Studios in its work such as funding partners, who require proof that our work engaged who we said it would – but in these cases the data will be shared in an anonymised way to protect your name and any contact details with the utmost privacy.

In exceptional cases where partners who support us to do our work require personal data, these "data processors" will be subject to contractual obligations containing strict data protection clauses. We do not allow these organisations to disclose your personal data to other third parties without our consent and we will take all reasonable care to ensure that they keep your data secure.

### ***Social media sites***

We may also use your email address and phone number to match to your account on social media sites in order to show you Step Change Studios content while using these services. We only do this where you have opted in to marketing emails or phone calls. No data we hold about you is retained by the third party.

In addition, we may also use your email address and phone number to link to social media sites in order to identify other users of these sites whom we believe would be interested in Step Change Studios, and we may then show them Step Change Studios content. No data we hold about you is retained by the third party.

There are two ways to prevent this use of your data, you can either update your preferences with Step Change Studios by opting out of the relevant channel of communication or you can do this via the social media site:

Facebook: <https://www.facebook.com/help/568137493302217>

Instagram: <https://help.instagram.com/402411646841720>

LinkedIn: <https://www.linkedin.com/help/linkedin/answer/62931>

Twitter: <https://business.twitter.com/en/help/troubleshooting/how-twitter-ads-wor...>

Updating your preferences with Step Change Studios will not guarantee that you never see Step Change Studios content on social media, since the social media site may select you based on other criteria and without your data having been provided by Step Change Studios.

### ***Current and former Step Change Studios employees and freelance workers***

When you stop working for Step Change Studios, Step Change Studios may process your data to respond to requests for employment references.

### ***Where legally required***

We will also comply with legal requests where disclosure is required or permitted by law (for example to government bodies, statutory bodies, or law enforcement agencies for tax purposes, where it is in the public interest, or the prevention and detection of crime, subject to appropriate protection in law).

### **How to control what we send you or request we update your personal information?**

The accuracy of your information is really important to us. We want to ensure that we are able to communicate with you in ways that you are happy with, and to provide you with information that is of interest.

If you wish to change how we communicate with you, or update the information we hold, then please contact us:

email us at [contact@stepchangestudios.com](mailto:contact@stepchangestudios.com)  
write to us at Step Change Studios, 2 Mandeville Place, London W1U 2BF  
call us on 07976 363861 (Mon-Fri 9am-5pm)

Additionally you can opt out of email separately.

### **How long will it take for these changes to be effective?**

We endeavour to meet the following service levels where supporters request we do not send them marketing information:

Email: 48 hours from receipt of email  
Telephone: 48 hours from receipt of request to opt out

Should you request we stop marketing to you by completing the contact us page on our website, it may take up to 14 days to complete your request due to the manual nature of this process.

### **How Step Change Studios keeps your data safe**

We ensure that there are appropriate technical controls in place to protect your personal details.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by staff, volunteers and contractors who comply with this privacy policy.

Where we use external companies who may collect or process personal data on our behalf, we undertake comprehensive checks on these companies before we work with them, and put a contract in place that sets out our expectations and requirements, especially regarding how they manage the personal data they collect on our behalf, or have access to.

These organisations - referred to as "Data Processors" also have legal liability for the way in which your data is used, providing you with additional protection.

## **Your rights over your personal data**

You have a variety of rights in respect of your data, including the rights to see, update, restrict, object to the use of or withdraw use of your data. In particular, depending upon why we hold your data, you may have the right to request:

- Access to the personal data we hold about you, including how we first obtained your details, free of charge in most cases (this is known as a 'Subject Access Request').
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we delete your personal data from our systems (this is known as the "Right to be Forgotten").
- That we no longer process your data automatically to decide whether particular marketing activities are likely to be of interest. This is known as profiling, and helps us to ensure that our marketing is relevant and appropriate.

You can contact us to request to exercise these rights at any time.

### *Opting out of Direct marketing*

You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We will always comply with your request.

Where we are sending you direct marketing on the basis of our legitimate interest, you can also ask us to stop. Where we send email marketing on a soft opt in basis, we will also comply with all requests to opt out.

### *Right to be Forgotten*

Upon request we will delete your personal data from our systems, to the extent that we are permitted to by law or regulatory guidelines. For instance under HMRC rules we are required to retain financial data for 7 years for audit purposes.

### *Subject Access Requests*

You have the right to request a copy of the personal information we hold about you. We will provide this as soon as possible, and within a month unless there are specific reasons why this would not be possible. We will always let you know if this is likely to be the case.

### *Checking your identity*

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you make under this Privacy Notice.

If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.

## **How to find out more, or make a complaint**

If you would like more information, to update your details or have any questions about this policy, please email at [contact@stepchangestudios.com](mailto:contact@stepchangestudios.com) or write to us at: Step Change Studios, 2 Mandeville Place, London W1U 2BF or call us on 07976363861 (Mon-Fri 9am-5pm).

To make a formal complaint about Step Change Studios' approach to data protection or raise privacy concerns directly please contact:

Founder  
Step Change Studios  
2 Mandeville Place  
London W1U 2BF  
Email: [contact@stepchangestudios.com](mailto:contact@stepchangestudios.com)

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.