

## Background

WildHearts understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our customers and supporters and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

## 1. Information About Us

Throughout this document, the following companies are collectively referred to as “WildHearts”, “we”, “our” or “us”:

- ♥ WildHearts Group Limited (SC480859)
- ♥ WildHearts Office Limited (SC290644)
- ♥ WildHearts Horizon Limited (SC480945)
- ♥ WildHearts Talent Limited (SC460773)
- ♥ WildHearts Foundation Limited (SC290655)

All are incorporated in Scotland with Registered Office at 5A The Square, 95 Morrison Street, Glasgow, G5 8BE.

## 2. What Does This Notice Cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

## 3. What is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

## 4. What Are My Rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- ♥ The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- ♥ The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- ♥ The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- ♥ The right to be forgotten, i.e., the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact using the details in Part 11 to find out more.
- ♥ The right to restrict (i.e., prevent) the processing of your personal data. The right to object to us using your personal data for a particular purpose or purposes.
- ♥ The right to data portability. This means that you can ask us for a copy of your personal data held by us to re-use with another service or business in many cases.
- ♥ Rights relating to automated decision-making and profiling. We do not use your personal data in this way.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

## 5. What Personal Data Do You Collect?

We may collect some or all of the following personal data (which will vary according to your relationship with us):

- ♥ Name
- ♥ Email address
- ♥ Business / Employer name
- ♥ Business / Employer address
- ♥ Delivery address (which may be a user's home address)
- ♥ Contact telephone number
- ♥ Job title
- ♥ School
- ♥ Year group

In respect of employees only, we also collect the following additional personal data:

- ♥ Home Address
- ♥ Date of birth
- ♥ Gender
- ♥ Education and qualifications
- ♥ Work experience
- ♥ National Insurance number
- ♥ Tax code Bank account information
- ♥ Details of any known disability
- ♥ Sickness and absence information
- ♥ Emergency contact details
- ♥ Other information relevant to your employment

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources but in each case as permitted by applicable laws.

## 6. Use of website cookies

A cookie consists of information sent by our web server to your web browser and stored by the browser for a specified duration. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both “session” cookies and “persistent” cookies on our website. We will use the session cookies to keep track of you whilst you navigate the website; and we will use the persistent cookies to enable our website to recognise you when you visit. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

When someone visits our website, we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. Google’s privacy policy is available at: <http://www.google.com/privacypolicy.html>.

## 7. How Do You Use My Personal Data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you or your Employer, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

Providing and managing your customer account with WildHearts. Supplying our products and/or services to you. Communicating with you. This may include responding to emails or calls from you. Updating you on social impact and our programme of events through our monthly e-Newsletter and similar communications. You may unsubscribe or opt-out at any time through a direct link included on each such communication. HR and related administrative processes (in WildHearts’ capacity as an employer).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email and / or telephone with information about our products and services. WildHearts marketing activity is restricted to Business-to-Business communication and we do not engage in untargeted, mass email campaigns that could be perceived as spam.

Where legitimate interest is used as the lawful basis for processing your personal information, we first undertake a Balancing Assessment to ensure our marketing communications are relevant, do not infringe on your rights and freedoms, and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003. Criteria that are considered include (but are not limited to) your job title, employer, the company size, industry, and geographical location. You will always have the opportunity to opt-out.

## 8. How Long Will You Keep My Personal Data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected.

An information audit is undertaken at least annually. We will destroy or de-identify personal information once it is determined that we no longer require it for our business purposes, or as required by law.

## 9. How and Where Do You Store or Transfer My Personal Data?

We will only store your personal data within the European Economic Area (the “EEA”). The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein. This means that your personal data will be fully protected under the GDPR or to equivalent standards by law.

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction, or damage. We will do our best to protect your personal information, but we cannot guarantee the security of your information which is transmitted to our website, applications, or services or to other website, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at [info@wildheartsgroup.com](mailto:info@wildheartsgroup.com).

## 10. Do You Share My Personal Data?

Personal information we collect may be shared across WildHearts companies (as listed in Section 1) and processed in accordance with common group policies.

WildHearts also works with a small number of fulfilment partners who deliver certain aspects of our services. Personal information shared with such partners is restricted to that necessary for the fulfilment of contractual obligations.

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party’s obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

We do not and will not sell, rent out or trade your personal information.

## 11. How Can I Access My Personal Data?

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use and can be accessed [here](#). You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will normally respond to your subject access request within 7 working days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

## 12. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of the Data Protection Officer):

Email address: [compliance@wildheartsgroup.com](mailto:compliance@wildheartsgroup.com)

Telephone number: 0141 611 9777

Postal Address: 5A The Square, 95 Morrison Street, Glasgow, G5 8BE

## 13. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. We will always update this Privacy Notice at the bottom of our website.