



Privacy Policy (GPDR) 2026 - 2027

Provision	The Donkey Den
Policy	Privacy Policy (GPDR)
Date created	September 2026
Date of review	September 2027
This policy will be reviewed on an annual basis; however, should a need arise, it will be reviewed when required. This policy will be read, understood, and signed by all staff yearly	

What is the GDPR?

GDPR stands for The General Data Protection Regulations and it came into force on 25th May 2018. It replaces the Data Protection Act 1998. The GPDR sets out requirements for how organisations need to handle personal data. Personal data means any information which, directly or indirectly , could identify a living person. Organisations are subject to stricter rules about how your personal data is stored and processed. GPDR gives you more control over your personal data, what companies do with it, how they manage it, and how you access it.

The Donkey Den receives your information through various methods. We hold your information, and therefore we are committed to keeping it safe and secure.

Who are we?

The Donkey Den is a 'controller' under the General Data Protection Regulation and the Data Protection Act 2018.

Whose data do we hold?

We may hold data about the following people:

- Employees
- Clients
- Suppliers and service providers
- Advisers, consultants and other professional experts
- Complainants and enquirers

What data will we collect?

We will only collect information from you that is relevant to the matter that we are dealing with. In particular we may collect the following information from you which is defined as 'personal data'

- Personal details
- Family, lifestyle and social circumstances

Special Categories

We may also collect information that is referred to as being in a 'special category'. This could include:

- Physical or mental health details
- Racial or ethnic origin
- Religious beliefs or other beliefs of a similar nature
- Criminal convictions
- Sexual orientation

Basis for processing

The basis on which we process your personal data is one or more of the following:

- It is necessary for the performance of our contract with you
- It is necessary for us to comply with a legal obligation
- It is in our legitimate interests to do so
- You have given us your consent (this can be withdrawn at any time by advising our data protection officer)

How will we use your data?

We may use your information for the following purposes:

- Promotion of services
- Provision of education to clients
- Maintaining accounts and records
- Supporting and managing staff

Who will we share your information with?

Under our Code of Conduct, there are very strict rules about whom we can share your information with.

- Website and Social media platforms, photographs if consent obtained.
- Other professionals or representatives if consent is obtained.

How long will we keep your Information for?

- We will normally keep your information throughout the period of time that we work with you and afterwards for a period of three years. This information will then be destroyed/ deleted.
- In some cases we may retain your information for a longer period and we will advise you of this at the time.

Security arrangements

- We shall ensure that all the information that you provide to us is kept secure using appropriate technical and organisational measures.
- In the event of a personal data breach we have in place procedures to ensure that the effects of such a breach is minimised and shall liaise with the ICO and with you as appropriate.
- More Information is available from the data protection officer

What rights do you have?

You have the following rights under the GDPR:

- Right to be informed
- Right of access
- Right to rectification
- Right to erasure
- Right to restriction of processing
- Right to data portability
- Right to object
- Rights concerning automated decision-making and profiling

Right of access

- You have a right to see the information we hold about you
- To access this you need to provide a request in writing to our data protection officer, together with proof of identity.
- We will usually process your request free of charge and within 30 days however we reserve the right to charge a reasonable administration fee and to extend the period of time by a further two months if the request is manifestly unfounded or vexatious and/or is very complex.

Right to erasure

- You have a right to ask us to erase your personal data in certain cases (details may be found in Article 17 of the GDPR)
- We will deal with your request free of charge and within 30 days but reserve the right to refuse to erase information that we are required to retain by law or regulation, or that is required to exercise or defend legal claims
- To exercise your right to erasure please contact our data protection officer

Who can you complain to?

- If you are unhappy about how we are using your information or how we have responded to your request then initially you should contact Claire Goodman who is responsible for Data Protection.
- If your complaint remains unresolved then you can contact the Information Commissioner's Office, details available at www.ico.org.uk