

Website Privacy Notice

This is the website privacy notice of Just Friends. In this document, "we", "our", or "us" refer to Just Friends.

We are a registered independent charity, our Small Charities Coalition registration number is **1122297**

Our office address is 3 Blackwater Road, Eastbourne, East Sussex BN21 4JF.

Introduction

1. This is a notice to inform you of our policy about all information that we record about you. It sets out the conditions under which we may process any information that we collect from you, or that you provide to us. It covers information that could identify you ("personal information") and information that could not. In the context of the law and this notice, "process" means collect, store, transfer, use or otherwise act on information.
2. We regret that if there are one or more points below with which you are not happy, your only recourse is to leave our website immediately.
3. We take seriously the protection of your privacy and confidentiality. We understand that all visitors to our website are entitled to know that their personal data will not be used for any purpose unintended by them, and will not accidentally fall into the hands of a third party.
4. We undertake to preserve the confidentiality of all information you provide to us, and hope that you reciprocate.
5. Our policy complies with UK law accordingly implemented, including that required by the EU General Data Protection Regulation (GDPR).
6. The law requires us to tell you about your rights and our obligations to you in regards to the processing and control of your personal data. We do this now, by requesting that you read the information provided at www.knowyourprivacyrights.org
7. Except as set out below, we do not share, or sell, or disclose to a third party, any information collected through our website.

1. Information we process with your consent

Through certain actions when otherwise there is no contractual relationship between us, such as when you browse our website or contact us for more information, you provide your consent to us to process information that may be personal information.

Wherever possible, we aim to obtain your explicit consent to process this information, for example, by asking you to agree to our use of cookies.

Sometimes you might give your consent implicitly, such as when you send us a message by e-mail to which you would reasonably expect us to reply.

Except where you have consented to our use of your information for a specific purpose, we do not use your information in any way that would identify you personally. We may aggregate it in a general way and use it to provide class information, for example to monitor the performance of a particular page on our website.

We continue to process your information on this basis until you withdraw your consent or it can be reasonably assumed that your consent no longer exists.

You may withdraw your consent at any time by contacting us. However, if you do so, you must also not use our website further.

2. Information we process for the purposes of legitimate interests

We may process information on the basis there is a legitimate interest, either to you or to us, of doing so.

Where we process your information on this basis, we do after having given careful consideration to:

- whether the same objective could be achieved through other means
- whether processing (or not processing) might cause you harm
- whether you would expect us to process your data, and whether you would, in the round, consider it reasonable to do so

For example, we may process your data on this basis for the purposes of:

- responding to unsolicited communication from you to which we believe you would expect a response
- protecting and asserting the legal rights of any party
- protecting your interests where we believe we have a duty to do so

3. Information we process because we have a legal obligation

We are subject to the law. Sometimes, we must process your information in order to comply with a statutory obligation.

For example, we may be required to give information to legal authorities if they so request or if they have the proper authorisation such as a search warrant or court order.

This may include your personal information.

4. Complaints regarding content on our website

If you complain about any of the content on our website, we shall investigate your complaint.

If we feel it is justified or if we believe the law requires us to do so, we shall remove the content while we investigate.

5. Sending a message to us

When you contact us, whether by telephone, through our website or by e-mail, we collect the data you have given to us in order to reply with the information you need.

We record your request and our reply in order to increase the efficiency of our organisation.

We may keep personally identifiable information associated with your message, such as your name, email address and telephone number so as to be able to track our communications with you to provide a high quality service.

6. Complaining

When we receive a complaint, we record all the information you have given to us.

We use that information to resolve your complaint.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

We may also compile statistics showing information obtained from this source to assess the level of service we provide, but not in a way that could identify you or any other person.

7. Cookies

We provide information about cookies in our cookie policy.

8. Personal identifiers from your browsing activity

Requests by your web browser to our servers for web pages and other content on our website are recorded.

We record information such as your geographical location, your Internet service provider and your IP address. We also record information about the software you are using to browse our website, such as the type of computer or device and the screen resolution.

We use this information in aggregate to assess the popularity of the webpages on our website and how we perform in providing content to you.

If combined with other information we know about you from previous visits, the data possibly could be used to identify you personally, even if you are not signed in to our website.

9. Our use of re-marketing

Re-marketing involves placing a cookie on your computer when you browse our website in order to be able to serve to you an advert for our products or services when you visit some other website. This is not a practice that we intentionally participate in.

Disclosure and sharing of your information

10. Information we obtain from third parties

Although we do not disclose your personal information to any third party (except as set out in this notice), we may receive data that is indirectly made up from your personal information from third parties whose services we use.

No such information is personally identifiable to you.

11. Third party advertising on our website

We do not allow any third party advertising on our website.

12. Data may be processed outside the United Kingdom

Our website is hosted within the United Kingdom.

We may also use outsourced services in countries outside the United Kingdom from time to time as an operational feature of the website.

Accordingly data obtained within the United Kingdom or any other country could be processed outside the United Kingdom.

Other matters

13. Use of site by children

- 13.1. If you are under 18, you may use our website only with consent from a parent or guardian
- 13.2. We collect data about all users of and visitors to the website regardless of age, and we anticipate that some of those users and visitors will be children.

14. Encryption of data sent between us

We use Secure Sockets Layer (SSL) certificates to verify our identity to your browser and to encrypt any data you give us.

Whenever information is transferred between us, you can check that it is done so using SSL by looking for a closed padlock symbol or other trust mark in your browser's URL bar or toolbar.

15. How you can complain

- 15.1. If you are not happy with our privacy policy or if have any complaint then you should tell us by email. Our address is info@just-friends.uk
- 15.2. If a dispute is not settled then we hope you will agree to attempt to resolve it by engaging in good faith with us in a process of mediation or arbitration.
- 15.3. If you are in any way dissatisfied about how we process your personal information, you have a right to lodge a complaint with the Information Commissioner's Office. This can be done at <https://ico.org.uk/concerns/>

16. Retention period for personal data

Except as otherwise mentioned in this privacy notice, we keep your personal information only for as long as required by us:

- 16.1. to provide you with the services you have requested;

16.2. to comply with other law, including for the period demanded by our tax authorities;

16.3. to support a claim or defence in court.

17. Compliance with the law

Our privacy policy has been compiled so as to comply with the law of England and Wales.

18. Review of the this Privacy Policy

We may update this privacy notice from time to time as necessary. The terms that apply to you are those posted here on our website on the day you use our website. We advise you to print a copy for your records.

If you have any question regarding our privacy policy, please contact us.