

## THE PRIVACY POLICY

of the

### FINDHORN FOUNDATION

The Findhorn Foundation (FF) is committed to protecting and respecting your personal data.

This statement and the terms of our Privacy Policy sets out the basis on which any personal data FF collects from you, or that you provide to FF, will be collected, processed and shared by FF. Please read the following carefully to understand FF's views and practices regarding your personal data and how FF will treat it. By visiting <https://www.findhorn.org/> or any sub-domains, and/or submitting your information to FF, you will submit personal data to FF which will be collected, processed, shared and stored in accordance with the practices described in this policy.

For the purpose of the General Data Protection Regulations (the GDPR), the data controller is The Findhorn Foundation of The Park, Findhorn, Moray, Scotland, IV36 3TZ.

#### INFORMATION FF MAY COLLECT FROM YOU

FF may collect, process and share the following data about you:

- *Information you give FF.* You may give FF information about you by filling in forms on [FF's site](#) or by corresponding with FF by phone, e-mail or otherwise. This includes information you provide when you register to a programme, search for a programme, place an order on FF's site, sign up to any subscription services, and when you report a problem with FF's site. The information you give FF may include your name, address and phone number, gender, e-mail address, financial and credit card information. Potential and actual participants on programmes may also give FF sensitive personal data about them which is kept by FF. The records may be notes of conversations or discussions or may be the result of formal questionnaire replies.
- *Information FF collects about you.* When you visit FF's site, FF may collect the following information:
  - Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, type of device, operating system and platform;
  - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from FF's site (including date and time); products or services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.
- *Information FF receives from other sources.* FF may receive information about you if you use any of the other websites/sub-domains FF operates or the other services FF provides. In this case FF will have informed you when FF collected that data that it may be shared internally and combined with data collected on this site. FF are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising

networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## COOKIES

FF's website uses cookies to distinguish you from other users of its website. This helps FF to provide you with a good experience when you browse its website and also allows FF to improve its site.

Cookies are pieces of data created when you visit a site, and contain a unique, anonymous number. They are stored in the cookie directory of your hard drive, and do not expire at the end of your session. Cookies used by FF contain no personal information about the user, nor does the website elicit or store any information from users other than the Internet Protocol address of the computer used to access the site. FF uses cookies for customising the daily angel cards, for tracking bookings of multiple programmes in one booking (i.e. "shopping cart"), and for tracking site statistics (Google Analytics). Cookies are not used for marketing and advertising purposes and no personal information will be disclosed to any other party.

Cookies on FF's website may safely be turned off by users without affecting how pages are displayed. Cookies can be disabled by adjusting your web browser settings. However if you choose not to accept cookies some parts of the website will not work properly, e.g. the daily angel cards.

## USES MADE OF THE INFORMATION

FF uses information and personal data held about you in the following ways:

- *Information you give to FF.* FF will use this information:
  - To carry out its obligations arising from any contracts entered into between you and FF and to provide you with the information, products and services that you request from FF;
  - In the case of programme participants, to make the programmes as relevant and effective as they can be, to safeguard all participants, to be able to analyse the appropriateness of the selection and follow through processes and so that long term studies of the effectiveness of them can be measured through academic research;
  - To provide you with information about other goods and programmes FF offers that are similar to those that you have already purchased or enquired about;
  - To provide you, or permit selected third parties to provide you, with information about goods or programmes FF feels may interest you. If you are an existing customer, FF will only contact you by electronic means (e-mail) with information about goods and programmes similar to those which were the subject of a previous sale or which you enquired about. If you are a new customer, and where FF permits selected third parties to use your data, FF (or they) will contact you by electronic means only if you have consented to this. If you do not want FF to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which FF collect your data (the order form);

- To notify you about changes to FF's service;
- To ensure that content from FF's site is presented in the most effective manner for you and for your computer.
- If you do not provide personal data to FF then you may not be able to participate in any of the FF programmes.
- *Information FF collects about you.* FF will use this information:
  - To administer FF's site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - To improve FF's site to ensure that content is presented in the most effective manner for you and for your computer or device;
  - To allow you to participate in interactive features of FF's service, when you choose to do so;
  - As part of FF's efforts to keep its site safe and secure;
  - To measure or understand the effectiveness of advertising FF serves to you and others, and to deliver relevant advertising and information to you;
  - To make suggestions and recommendations to you and other users of FF's site about goods, services programmes or activities that may interest you or them.
- *Information FF receives from other sources.* FF may combine this information with information you give to FF and information FF collects about you. FF may use this information and the combined information for the purposes set out above (depending on the types of information FF receives).

#### DISCLOSURE OF YOUR INFORMATION

FF may share your information with selected third parties including:

- Business partners, suppliers and subcontractors for the performance of any contract FF enters into with them or you.
- Analytics technical and search engine providers that assist FF in the improvement and optimisation of its IT systems and website and online services.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of FF entering into a contract with you.
- FF may disclose your personal data and information to third parties:
- In the event that FF sells or buys any business or assets, in which case FF may disclose your personal data to the prospective seller or buyer of such business or assets.
- If FF or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If FF is under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply FF's [terms of use](#) or [terms and conditions of supply](#) and other agreements;

or to protect the rights, property, or safety of FF, its customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

- For the purposes of performing a contractual obligation

#### WHERE FF STORE YOUR PERSONAL DATA

The data that FF collects from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for FF or for one of FF’s suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. FF will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to FF is stored on FF’s secure servers. Any payment transactions made through the site are handled by Sagepay. Where FF have given you (or where you have chosen) a password which enables you to access certain parts of FF’s site or sub-domains, you are responsible for keeping this password confidential. FF asks you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although FF will do its best to protect your personal data, FF cannot guarantee the security of your data transmitted to FF’s site; any transmission is at your own risk. Once FF has received your information, it will use strict procedures and security features to try to prevent unauthorised access.

#### THE PERIOD FOR WHICH AND INFORMATION MAY BE RETAINED

Personal data will be kept no longer than is necessary. This means that the data will be destroyed or erased from our systems when it is no longer required.

As a general rule, FF will keep personal data and information according to the following guidelines:

- The data and information provided when you register with FF for any programmes or services will be kept together with any updates that you make to such information for the duration of your membership on the programme and for an appropriate period thereafter in accordance with appropriate regulatory and legal timescales. For example, for individuals who work for FF, records containing personal data will be kept for a minimum period of 7 years for tax record purposes; personal data of all visitors and participants, programmes and service users will be kept for a minimum of 3 years for the purposes of any personal injury claims.
- All timescales for retention and destruction of personal data subject to the principle of proportionality in relation to the timescales and the types of personal data which is to be retained.

- Personal data may also be retained for historical and archival records and research purposes to document the history and development of the FF from its inception to the present day.
- FF will regularly review and audit its data storage and is committed to destroying personal data that is no longer required to be retained for legitimate purposes.

#### YOUR RIGHTS

Where FF relies on consent to use your personal data and information, you have the right to withdraw that consent at any time. You have the right to ask FF not to process your personal data for marketing purposes. FF will usually inform you (before collecting your data) if it intends to use your data for such purposes or if FF intends to disclose your personal data or information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms FF uses to collect your data. You can also exercise the right at any time by writing to the General Secretary at the Findhorn Foundation, The Park, Findhorn, Moray, Scotland, IV36 3TZ.

FF's site may, from time to time, contain links to and from the websites of its partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that FF does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. You have the right to:

- Access and update the contact personal details and data we hold about you;
- View the personal data which we hold about you;
- Opt out of receiving marketing communications by post or email or text message or other electronic or paper-based methods;
- Opt out of receiving postal marketing communications from FF and companies acting on behalf of FF;
- Request access for your information;
- Ask that you update, complete or direct your information;
- Ask that we restrict our use of your data and information;
- Request that we provide your information to you in a commonly used electronic format and to have that information transmitted directly to another organisation (this is known as the right to “data portability”);
- Object to FF or any companies acting on its behalf using your personal data or information in certain circumstances or at all.

#### ACCESS TO INFORMATION

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the GDPR. If you wish to make a subject access request, you should write to the General Secretary at the Findhorn Foundation, The Park, Findhorn, Moray, Scotland, IV36 3TZ.

#### CHANGES TO FF'S PRIVACY POLICY

Any changes FF may make to this privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to FF's privacy policy.

#### CONTACT

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to the General Secretary at the Findhorn Foundation, The Park, Findhorn, Moray, Scotland, IV36 3TZ.