

## PRIVACY POLICY

*of the*  
FINDHORN FOUNDATION (“FF”)

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

This policy and the terms of use sets out the basis on which any personal data the FF collects from you, or that you provide to the FF, will be processed by the FF. Please read the following carefully to understand the FF's views and practices regarding your personal data and how the FF will treat it. By visiting [findhorn.org](http://findhorn.org) or any sub-domains, and/or submitting your information to the FF, you will submit personal data to the 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 The FF May Collect From You

The FF may collect and process the following data about you:

- *Information you give the FF.* You may give the FF information about you by filling in forms on the FF's site [findhorn.org](http://findhorn.org) or by corresponding with the 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 the FF's site, sign up to any subscription services, and when you report a problem with the FF's site. The information you give the 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 the FF sensitive personal data about them which is kept by the FF. The records may be notes of conversations or discussions or may be the result of formal questionnaire replies.
- *Information the FF collects about you.* When you visit the FF's site, the 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 the 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 the FF receives from other sources.* The FF may receive information about you if you use any of the other websites/subdomains the FF operates or the other services the FF provides. In this case the FF will have informed you when the FF collected that data that it may be shared internally and combined with data collected on this site. The 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

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

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

- *Information you give to the FF.* The FF will use this information:
  - To carry out its obligations arising from any contracts entered into between you and the FF and to provide you with the information, products and services that you request from the 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 the 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 the FF feels may interest you. If you are an existing customer, the 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 the FF permits selected third parties to use your

*Privacy Policy*

data, the FF (or they) will contact you by electronic means only if you have consented to this. If you do not want the 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 the FF collect your data (the order form);

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

above (depending on the types of information the FF receives).

## Disclosure of your Information

The FF may share your information with selected third parties including:

- Business partners, suppliers and subcontractors for the performance of any contract the FF enters into with them or you.
- Analytics technical and search engine providers that assist the FF in the improvement and optimisation of its IT systems and website and on-line services.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of the FF entering into a contract with you.

The FF may disclose your personal data and information to third parties:

- In the event that the FF sells or buys any business or assets, in which case the FF may disclose your personal data to the prospective seller or buyer of such business or assets.
- If the 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 the 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 the FF's [terms of use](#) or [terms and conditions of supply](#) and other agreements; or to protect the rights, property, or safety of the 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 The FF Stores Your Personal Data

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

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

## The Period For Which 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, the FF will keep personal data and information according to the following guidelines:

- The data and information provided when you register with the FF for any programmes or services will be kept together with any updates that you make to

## *Privacy Policy*

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 the 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 are 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.
- The 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 the 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 the FF not to process your personal data for marketing purposes. The FF will usually inform you (before collecting your data) if it intends to use your data for such purposes or if the 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 the FF uses to collect your data. You can also exercise the right at any time by writing to the Compliance Officer at the Findhorn Foundation, The Park, Findhorn, Moray, Scotland, IV36 3TZ.

The 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 the 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 the 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 the 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 Compliance Officer at the Findhorn Foundation, The Park, Findhorn, Moray, Scotland, IV36 3TZ.

## Changes To The FF's Privacy Policy

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

## Contact

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