

1. INTRODUCTION

This privacy policy provides you with details of how we collect and process your personal information, including through our website www.makingspace.co.uk, or as a result of signing up for our newsletter, or membership.

By providing information to use through the website, you state that you are over 13 years of age.

Making Space are the data controller and we are responsible for your personal information (referred to as “we”, “us” or “our” in this privacy notice).

Our full details are:

Full name of legal entity: Making Space

Email address: enquiries@makingspace.co.uk

Postal address: Lyne House, 46 Allen Street, Warrington, Cheshire, WA2 7JB

Telephone: 01925 571680

postal address is Lyne House, 46 Allen Street, Warrington, Cheshire, WA2 7JB.

If you are not happy with any aspect of how we collect and use your information, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at business.support@makingspace.co.uk.

Sensitive Information

We need to collect the following sensitive information about you in order to deliver the service.

This information includes

- race;
- ethnic origin;
- religion;
- gender,
- physical and/or mental health condition or
- sexual orientation.

The essential information that is processed is around your health as this is required to carry out the service. The additional information is required through Equality and Diversity monitoring. This information is optional, but would be beneficial to complete contract monitoring.

We need to collect the following sensitive information about you in order to deliver the services commissioned.

We require your explicit consent for processing sensitive information. The majority of this information is to ensure that we can provide a service to you. As a result, the consent is given at the start of service provision.

Where we are required to collect personal information by law, or under the terms of the contract between us and you do not provide us with that information when requested, we may not be able to perform the contract (for example, to deliver goods or services to you). If you don't provide us with the requested information, we may have to cancel a product or service you have ordered but if we do, we will notify you at the time.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU

Personal information means any information capable of identifying an individual. It does not include anonymised information.

We may process certain types of personal information about you as follows:

- **Identity Information** may include your first name, maiden name, last name, username, marital status, title, date of birth and gender.
- **Contact Information** may include your billing address, delivery address, email address and telephone numbers.
- **Financial Information** may include your bank account and payment card details.
- **Transaction Information** may include details about payments between us and other details of purchases made by you.
- **Technical Information** may include your login information, internet protocol addresses, browser type and version, browser plug-in types and versions, time zone setting and location, operating system and platform and other technology on the devices you use to access this site.
- **Profile Information** may include your username and password, purchases or orders, your interests, preferences, feedback and survey responses.
- **Usage Information** may include information about how you use our website, products and services.
- **Marketing and Communications Information** may include your preferences in receiving marketing communications from us and our third parties and your communication preferences.

We may also process Aggregated Data from your personal information but this information does not reveal your identity and as such in itself is not personal information. An example of

this is where we review your Usage Data to work out the percentage of website users using a specific feature of our site. If we link the Aggregated Information with your personal information so that you can be identified from it, then it is treated as personal information.

3. HOW WE USE YOUR PERSONAL INFORMATION

We will only use your personal information when legally permitted. The most common uses of your personal information are:

- Where we need to perform the contract between us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal ground for processing your personal information, other than in relation to sending marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by emailing us at qa@makingspace.co.uk

Purposes for processing your personal information

Set out below is a description of the ways we intend to use your personal information and the legal grounds on which we will process such information. We have also explained what our legitimate interests are where relevant.

We may process your personal information for more than one lawful ground, depending on the specific purpose for which we are using your information. Please email us at qa@makingspace.co.uk if you need details about the specific legal ground we are relying on to process your personal information where more than one ground has been set out in the table below.

Purpose/Activity	Type of information	Lawful basis for processing
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests to recover debts owed to us
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or	(a) Identity (b) Contact (c) Profile (d) Marketing and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

<p>privacy policy (b) Asking you to leave a review or take a survey</p>	<p>Communications</p>	<p>(c) Necessary for our legitimate interests to keep our records updated and to study how customers use our products/services</p>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests to study how customers use our products/services, to develop them and grow our business</p>
<p>To administer and protect our business and our site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content and advertisements to you and measure and understand the effectiveness of our advertising</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>(a) Technical (b) Usage</p>	<p>Necessary for our legitimate interests to define types of customers for our products and services, to keep our site updated and relevant, to develop our business and to inform our marketing strategy</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<p>(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile</p>	<p>Necessary for our legitimate interests to develop our products/services and grow our business</p>

Marketing communications

You will receive marketing communications from us if you have:

- requested information from us or purchased goods or services from us; or
- if you provided us with your details and ticked the box at the point of entry of your details for us to send you marketing communications; and
- in each case, you have not opted out of receiving that marketing.

We will get your express opt-in consent before we share your personal information with any third party for marketing purposes.

You can ask us or third parties to stop sending you marketing messages at any time by emailing us at enquiries@makingspace.co.uk at any time.

Where you opt out of receiving our marketing communications, this will not apply to personal information provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to find out more about how the processing for the new purpose is compatible with the original purpose, please email us at QA@makingspace.co.uk.

If we need to use your personal information for a purpose unrelated to the purpose for which we collected the information, we will notify you and we will explain the legal ground of processing.

We may process your personal information without your knowledge or consent where this is required or permitted by law.

4. DISCLOSURES OF YOUR PERSONAL INFORMATION

We may have to share your personal information with the parties set out below for the purposes set out in the table in paragraph 2 above:

- Local authorities, Safeguarding, GP's, multi-disciplinary team members, commissioners, social workers, CMHT so that we can provide a holistic care and support package specific to your needs and requirements
- Service providers who provide IT and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
- Third parties to whom we sell, transfer, or merge parts of our business or our assets.

We require all third parties to whom we transfer your information to respect the security of your

personal information and to treat it in accordance with the law. We only allow such third parties to process your personal information for specified purposes and in accordance with our instructions.

We do not transfer your personal information outside the European Economic Area (**EEA**).

5. INFORMATION SECURITY

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know such information. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. INFORMATION RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Information) for six years after they cease being customers for tax purposes. For some individuals we support, we may need to keep the information for up to 20 years after last visit.

In some circumstances you can ask us to delete your information: see below for further information.

In some circumstances we may anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

7. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information. These include the right to:

- Request access to your personal information.
- Request correction of your personal information.
- Request erasure of your personal information.
- Object to processing of your personal information.
- Request restriction of processing your personal information.
- Request transfer of your personal information.
- Right to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you wish to exercise any of the rights set out above, please email us at **qa@makingspace.co.uk**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

8. THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share information about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

9. COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see the policy on the website.

10. REVIEW

This policy will be reviewed every 3 years or sooner if required by changes in legislation or best practice.

11. DOCUMENT CONTROL

Date of Change	Summary of Change	Contact	Issue Date	Issue Number
20.05.2025	Reviewed Policy	P.Orton	20.05.2025	3