



WEBSITE PRIVACY POLICY	
Lead professional: Leonie Berry	
Policy agreed by SEND Supported Partners:	
Date policy agreed:	Review date: (2 yrs)

1. Introduction

- 1.1 We are committed to safeguarding the privacy of our website visitors and customers.
- 1.2 This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.
- 1.3 In this policy, "we", "us" and "our" refer to SEND Supported.

2. Credit

- 2.1 This document was created using a template from Docular (<https://seqlegal.com/free-legal-documents/privacy-policy>).

3. The personal data that we collect

- 3.1 In this Section 3 we have set out the general categories of personal data that we process.
- 3.2 We may process data enabling us to get in touch with you ("contact data"). The contact data may include your name, email address, telephone number, postal address and/or social media account identifiers. The source of the contact data is you and/or your employer.
- 3.3 We may process your website user account data ("account data"). The account data may include your account identifier, name, email address, business name, account creation and modification dates, website settings and marketing preferences. The primary source of the account data is you and/or your employer, although some elements of the account data may be generated by our website.
- 3.4 We may process information relating to transactions, including purchases of goods and/or services, that you enter into with us and/or through our website ("transaction data"). The transaction data may include your name, your contact details, your payment card details (or other payment details) and the transaction details. The source of the transaction data is you and/or our payment services provider.
- 3.5 We may process information contained in or relating to any communication that you send to us or that we send to you ("communication data"). The communication data may include the communication content and metadata associated with the communication.

3.6 We may process service level agreement information. This data may include



information about the special educational needs of your pupils but will not include personal pupil data. The source of this data is you and/or your employer.

4. Purposes of processing and legal bases

4.1 In this Section 4, we have set out the purposes for which we may process personal data and the legal bases of the processing.

4.2 Operations - We may process your personal data for the purposes of operating our website, the processing and fulfilment of orders, providing our services, supplying our goods, generating invoices, bills and other payment-related documentation, and credit control. The legal basis for this processing is our legitimate interests, namely the proper administration of our website, services and business.

4.3 Relationships and communications - We may process contact data, account data, transaction data and/or communication data for the purposes of managing our relationships, communicating with you (excluding communicating for the purposes of direct marketing) by email, SMS, post, fax and/or telephone, providing support services and complaint handling. The legal basis for this processing is our legitimate interests, namely communications with our website visitors, service users, individual customers and customer personnel, the maintenance of relationships, and the proper administration of our website, services and business.

4.4 Direct marketing - We may process contact data, account data and/or transaction data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is our legitimate interests, namely promoting our business and communicating marketing messages and offers to our website visitors and service users.

4.5 Record keeping - We may process your personal data for the purposes of creating and maintaining our databases, back-up copies of our databases and our business records generally. The legal basis for this processing is our legitimate interests, namely ensuring that we have access to all the information we need to properly and efficiently run our business in accordance with this policy.

4.6 Legal claims - We may process your personal data where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

4.7 Legal compliance and vital interests - We may also process your personal data where such processing is necessary for compliance with a legal obligation to which we are subject or in order to protect your vital interests or the vital interests of another natural person.

5. Providing your personal data to others

5.1 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice.

5.2 In addition to the specific disclosures of personal data set out in this Section 5, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise, or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

6. Retaining and deleting personal data

6.1 This Section 6 sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

6.3 We will retain your personal data as follows:

- (a) contact data will be retained for a minimum period of 12 months following the date of the most recent contact between you and us, and for a maximum period of 36 months following that date;
- (b) account data will be retained for a minimum period of 12 months following the date of closure of the relevant account, and for a maximum period of 36 months following that date; and
- (c) communication data will be retained for a minimum period of 12 months following the date of the communication in question, and for a maximum period of 36 months following that date.

6.4 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

7. Your rights

7.1 In this Section 7, we have listed the rights that you have under data protection law.

7.2 Your principal rights under data protection law are:

- (a) the right to access - you can ask for copies of your personal data;
- (b) the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
- (c) the right to erasure - you can ask us to erase your personal data;
- (d) the right to restrict processing - you can ask us to restrict the processing of your personal data;
- (e) the right to object to processing - you can object to the processing of your personal data;
- (f) the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
- (g) the right to complain to a supervisory authority – you can complain about our processing of your personal data; and
- (h) the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.

7.3 These rights are subject to certain limitations and exceptions. You can learn more about the rights of data subjects by visiting [The European Data Protection Board website](#)

7.4 You may exercise any of your rights in relation to your personal data by written notice to us, using the contact details set out below.

8. Amendments

8.1 We may update this policy from time to time by publishing a new version on our website.

8.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

8.3 We may notify you of changes to this policy by email.

9. Our details

9.1 This website is owned and operated by SEND Supported LLP.

9.2 We are registered in England and Wales under registration number OC419934, and our registered office is at The Emscote Centre, Nelson Lane, Warwick CV34 5JB.

9.3 You can contact us using our website contact form.

10. Data protection officer

10.1 Our data protection officer's contact details are:

Clair Cole: clair@sendsupported.com