

Website Privacy Notice

How CIRC uses personal information collected through its website and online activities

Document control	Details
Organisation	Community Integration & Recovery Centre (CIRC) C.I.C.
Document owner	Data Protection Lead
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Status	Approved website version

Purpose and status. This document sets the standard expected by Community Integration & Recovery Centre (CIRC) C.I.C.. It should be read with applicable law, contractual requirements, local safeguarding procedures and related operational procedures. It does not replace professional judgement or legal advice in a specific case.

Who we are

Community Integration & Recovery Centre (CIRC) C.I.C. is a Community Interest Company registered in England and Wales with company number 17079079 and registered office at 81 Tempest Street, Wolverhampton, England, WV2 1AA. CIRC is the controller of the personal information described in this notice unless we state otherwise. Email admin@circcic.com, use the Contact page at www.circcic.co.uk, or write to Community Integration & Recovery Centre (CIRC) C.I.C., 81 Tempest Street, Wolverhampton, England, WV2 1AA. Please mark data-protection correspondence “For the Data Protection Lead” and safeguarding correspondence “Private and confidential - safeguarding”.

What this notice covers

This notice applies when you visit our website, contact us, make or receive a referral, register for an event or programme, complete a form or survey, request training or support, volunteer, apply for a role, donate, subscribe to updates, or otherwise engage with CIRC online. Additional privacy information may be provided for a specific programme, research activity, partnership or event.

Information we collect

Category	Examples
Identity and contact	Name, title, organisation, postal address, email address, telephone number and preferred contact method.
Enquiry, referral and participation	Your message, support requested, eligibility or referral information, programme registration,

Category	Examples
	attendance, goals, feedback and correspondence.
Employment and professional	Occupation, employer, qualifications, skills, work history, sponsorship or employment concerns and professional development interests.
Special category information	Health or wellbeing information, disability, race or ethnicity, religion, sexual orientation or other sensitive information only where necessary and lawful for support, safeguarding, accessibility, equality monitoring or research.
Event and media	Attendance, accessibility needs, consent choices, photographs, video or audio where separately authorised.
Donation and transaction	Donation amount, reference and transaction status. Payment-card details are normally processed directly by the payment provider rather than stored by CIRC.
Technical and usage	IP address, device and browser information, security logs, pages visited, referring URL, approximate location and cookie identifiers.

How and why we use information

Purpose	Typical lawful basis	Additional condition where relevant
Respond to enquiries, referrals and requests	Steps at your request before a contract; contract; legitimate interests in responsive administration.	Explicit consent, substantial public interest, vital interests or another applicable condition.
Deliver integration, employment, training, mentoring and wellbeing programmes	Contract; legitimate interests; legal obligation; vital interests; public task where applicable.	Health or social care where applicable; safeguarding; substantial public interest; explicit consent.
Manage events, participation and accessibility	Contract; legitimate interests; consent for optional uses.	Explicit consent or substantial public interest where sensitive information is needed.
Protect people and respond to safeguarding or serious welfare concerns	Legal obligation; vital interests; legitimate interests; public task where applicable.	Safeguarding of children and individuals at risk; vital interests; substantial public interest.
Recruit and manage staff, contractors and volunteers	Steps before contract; contract; legal obligation; legitimate interests.	Employment and social protection; equality monitoring; substantial public interest.

Purpose	Typical lawful basis	Additional condition where relevant
Administer donations and financial records	Contract; legal obligation; legitimate interests.	Not usually applicable.
Improve, secure and analyse the website and programmes	Legitimate interests; consent for non-essential cookies or optional research.	Research and statistics safeguards or explicit consent where applicable.
Send optional news, invitations and campaigns	Consent, or legitimate interests where electronic-marketing law permits.	Not usually applicable.

If information is required by law, a funder, a programme rule or a contract, we will explain the requirement and the likely consequence of not providing it. We will not use sensitive information merely because it may be useful.

Where information comes from

- directly from you;
- a representative, advocate, family member, employer, education provider, public body, health or community professional, commissioner or referral partner where lawful;
- event platforms, payment providers, website hosting, security and analytics suppliers;
- public professional, corporate or regulatory sources where relevant and proportionate.

Sharing information

We may share the minimum necessary information with authorised staff and volunteers; delivery partners; referral agencies; funders or commissioners where reporting is lawful and appropriately limited; IT, hosting, event, communications and payment suppliers; professional advisers; safeguarding authorities; emergency services; regulators; insurers; courts or public bodies where required or permitted by law. We do not sell personal information.

International transfers

If a supplier processes personal information outside the United Kingdom, CIRC will use a lawful transfer mechanism such as UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum, with a transfer assessment and additional safeguards where required.

Retention

CIRC retains information only for as long as necessary for the purpose and for legal, safeguarding, funding, contractual, insurance and accountability requirements. General website enquiries that do not develop into an ongoing relationship are normally deleted or anonymised within 24 months. Programme, consent, safeguarding, employment, complaint, grant and finance records follow the approved retention schedule and any funder or statutory requirements.

Cookies and similar technologies

Strictly necessary technologies may operate without consent where legally permitted. Analytics, advertising, preference and other non-essential technologies will operate only after a valid choice

through the cookie controls. A separate cookie notice should identify each technology, provider, purpose and duration and allow consent to be withdrawn easily.

Your rights and complaints

- to be informed and to request access;
- to ask for inaccurate or incomplete information to be corrected;
- to request erasure or restriction where the legal conditions apply;
- to receive certain information in a portable format;
- to object to processing based on legitimate interests or to direct marketing;
- to withdraw consent without affecting earlier lawful processing;
- to request human review of a solely automated decision with legal or similarly significant effects.

Rights are not absolute and exemptions may apply. We normally respond within one month after proportionate identity checks. You may complain to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/> or telephone 0303 123 1113. We would welcome the opportunity to address your concern first.

Security, children and changes

CIRC uses proportionate access controls, authentication, secure configuration, encryption where appropriate, training, supplier checks, backup and incident management. Where children or young people participate, CIRC will provide age-appropriate information and use consent or another lawful basis with suitable safeguards. CIRC does not currently make solely automated decisions through the website that produce legal or similarly significant effects. We may update this notice when services, suppliers or law change.

Authoritative sources

This document was prepared with reference to the following official sources. The online version of each source should be checked at review or following a material legal or regulatory change.

Information Commissioner's Office. Guide to data protection. <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/>

Information Commissioner's Office. Contracts and liabilities between controllers and processors. <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/contracts-and-liabilities-between-controllers-and-processors-uk-gdpr/>

UK legislation. Data Protection Act 2018. <https://www.legislation.gov.uk/ukpga/2018/12/contents>

UK legislation. Data Use and Access Act 2025. <https://www.legislation.gov.uk/ukpga/2025/18/contents>