Designability Privacy Notice – Income and Engagement Activities

About This Notice

This privacy notice can be made available in alternative formats, including Easy Read, large print, audio, or BSL supported formats, by contacting info@designability.org.uk or calling us on 01225 824103.

About Us

Designability is a national charity that creates innovative products and services with and for disabled people, removing barriers and helping them to live with greater independence.

For us to carry out our charitable activities, we often need to collect information about you. We recognise the importance of your privacy, and Designability is committed to ensuring that your privacy is always protected.

This notice indicates what kind of personal information Designability collects from people who support or engage with us, why we need it, how we use it, and what measures are in place to keep it secure.

For this notice, Designability is the *"data controller"* meaning we alone, or jointly with others, determine the purposes and means of the processing of personal data.

Data Protection Principles

When we communicate with you, we will:

- **Be clear and honest about how your information is used.** We will only use your information where you have given us permission to do so (consent). If you choose to share sensitive information, such as information about your health or disability, we may use this information to support our charitable aims to improve services, products, and a wider understanding of the lived experience and challenges faced by the disabled community.
- **Only collect information that we genuinely need.** We will only ask for the minimum personal information necessary to carry out our work and understand people's experiences.
- **Only use your information in the ways we have explained to you.** If we ever want to use your information for something new, we will tell you and ask permission, where required.
- **Take reasonable steps to make sure your information is accurate and up to date.**
- **Only keep your information for as long as it is needed for the purposes of the activity we have agreed, or where we are legally required to keep it.**
- **Keep your information safe and secure.** We use appropriate safeguards to protect your information and make sure it is not lost, misused, or shared in ways you would not expect.

When we process personal data, it is carried out in line with UK data protection laws, including the UK GDPR and the Data Protection Act 2018. Where we process sensitive personal information, we do this fully recognising the additional legal safeguards designed to protect such information.

What Do We Collect?

The level of engagement and therefore kind of information we may collect will vary depending on the reason we are communicating with you. This means we may ask for different information from you over time. Whenever we communicate with you, there will be clear information outlining the aims of the activity, the information we wish to collect from you, how it will be collected, and how we will use it.

Type of Personal Information we may collect (some examples)	**Why we Collect it**	**Lawful Basis**
Contact details	To send you information about our work or contact you while working with you.	Consent / Legitimate interest (email marketing) Legitimate interest (for administration or postal mail)
Donation information and history	To process donations and monitor funding allocations.	Legitimate interest
Payment Information (card details / bank information)	To process donations / participant payments, incentives. Reimbursements such as travel expenses	Performance of a contract
Accessibility requirements / disability information	To manage your participation in our activities by providing accessibility adjustments or support. To help us understand the barriers people face and improve products, services, and design guidance. To evaluate the impact of our research and charitable activities	Consent / Processing by a not-for-profit body with a political, philosophical, religious or trade union aim (Article 9(2)(d)
Marketing Preferences /Google Analytics cookie data	To tailor communication methods and improve our website content.	Consent
Social media data	To understand and engage with our supporters more effectively.	Legitimate Interest / Consent

	To share participant experiences, case studies, or content that helps raise awareness of barriers and promotes our charitable aims.	
Gift Aid declaration data	To reclaim tax on donations, and to comply with our legal obligations, including maintaining financial records in line with requirements from HM Revenue and Customs	Legal obligation
Images	Still image or video footage may be used in promoting the charitable activities of the organisation. Images may be captured on CCTV footage if you attend our premises, as part of our safety and security measures.	Consent Legitimate interest

When And How We Collect Your Data

We collect data about you in a variety of ways, e.g. online surveys, in person interviews, contact forms, from photographs or videos and from your use of our website. In some cases, we will collect data about you from third party organisations, e.g. fundraising sites like Just Giving.

These third party sites should have asked your permission before they share your information with us.

Please do not share another person's personal information with us unless it is both necessary for the activity and you are legally authorised to act on their behalf, e.g. have parental responsibility or legal guardianship)

Why We Collect And Use Your Data

We only use your personal information to pursue our charitable aims. We will not use your personal information for any other purpose within Designability, unless you have clearly given us permission to do so. Designability does not sell your information to any third parties.

designability

Consent for Direct Marketing

Where you have engaged with us [e.g., by purchasing a product / expressing an interest in our charitable purposes] and did not choose to opt-out at the point we collected your details, we will rely on Legitimate Interests to send you marketing communications by post and email. You will always be given a clear and simple option to object or unsubscribe both at the point of data collection and within every subsequent electronic communication we send.

Cookies and Tracking

To improve our website and maximise the impact of our work, we use first-party analytics cookies to monitor site performance. In line with the Data (Use and Access) Act 2025, these cookies are used solely by us, and your data is never shared with third parties for commercial tracking. You can easily disable these analytics cookies at any time by using our website's cookie control tool.

Withdrawal of Consent / 'Opting Out'

You have an absolute right to object to direct marketing or withdraw your consent at any time.

- **Electronic Messages:** Every marketing email or text we send includes a clear, free, and simple 'unsubscribe' or 'opt-out' link.
- **Contacting Us:** You can ask us to stop contacting you at any time by reaching out through any of our channels , including our email [info@designability.org.uk], phone line [01225 824103], website, or social media platforms).

If you change your mind, you can opt back in at any point in time to hear from us in the future.

Sharing Your Data

To support our charitable work, we may share personal information with a small number of trusted organisations and service providers where this is necessary for the relevant activity.

These may include:

- survey and form providers
- secure data storage and IT providers
- payment processors
- accessibility support providers
- transcription or analysis providers
- partner organisations involved in any research
- funders where reporting is required

- professional advisors or regulators where the law requires this

We only share the minimum amount of information necessary for the specific purpose.

Examples of who we may share data with	**Why we share it**	**Lawful basis**
Event partners or venues	To manage your attendance or ensure safety	Legitimate Interest
Employers (e.g. for match funding)	To process corporate support	Legitimate Interest
HMRC or similar regulatory bodies	To meet our legal obligations (e.g. processing Gift Aid)	Legal obligation
IT Software providers e.g. CRM providers	To help us manage supporter data securely	Legitimate interest
Fraud prevention bodies	To carry out due diligence	Legal obligation / Legitimate interest

Where possible, your information will be processed in the UK. If personal information is transferred outside the UK, we will ensure that an appropriate safeguard is in place, such as an adequacy decision or approved contractual safeguards, and we will provide more information on request.

Designability is a charity and not a support, benefits, or statutory decision-making service. We do not share information you have provided with organisations that provide support or benefits unless you ask us to do so or we are legally required to do so.

Designability does not sell your information to any third parties.

How We Protect Your Data

Appropriate controls are in place to store and protect personal data. We have security procedures in place to guard against unauthorised access, improper use, alteration, destruction or accidental loss of personal information. Information is only accessible by personnel authorised to do so, and data is stored and transmitted securely using methods such as encryption, anonymisation, or password protected files on data sets, held in secure password management systems.

Anonymised data that falls outside of the scope of data protection legislation (as it contains no identifying or identifiable information) may continue to be stored by Designability for the purposes of statistical analysis.

We use systems and processes designed to protect information with appropriate technical and organisational measures. All staff at Designability receive regular training in information governance and handling personal data, including the requirements of the UK GDPR and the Data Protection Act 2018. We also consider our duties under equality and accessibility legislation in our communications and engagement.

How Long We Keep Your Data

In line with data protection principles, we only keep your personal data for as long as it is necessary for the relevant research purpose, to meet legal, accounting, insurance, safeguarding, or funding requirements, or to establish, exercise, or defend legal claims.

The retention period may vary depending on the nature of the activity and any funder or regulatory requirements. We will explain any activity-specific retention period at the start of our interaction, where this differs from our usual approach.

Data will be securely destroyed when no longer needed, according to our agreed retention schedule, or anonymised.

Your Data Protection Rights

Under data protection law you have legal rights concerning personal information held by us, including

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to object
- The right to data portability, where applicable
- Rights in relation to automated decision-making, where applicable

We aim to ensure that the information we hold about you is accurate and up to date. You can ask for a copy of the personal information we hold about you, ask us to correct inaccurate information, and in some circumstances ask us to delete or restrict the use of your information, object to processing, or receive a copy of information you provided to us in a portable format where that right applies. Some of these rights may be limited where an exemption applies under data protection law, including certain exemptions for research, statistics, or archiving where appropriate safeguards are in place.

Similarly, at the point a deletion request is made, personal data may already have been incorporated into anonymised or aggregated analysis. Whilst anonymised analysis cannot

usually be altered or removed, we will delete associated identifiable personal data, wherever possible.

If you wish to exercise any of your rights or ask questions about how we handle your personal information, please contact a member of the income and engagement team in the first instance. If they are unable to assist, or if you wish to raise a complaint, please contact Designability's Data Protection Officer using the details below.

Requests and Complaints

If you submit a subject access request or another data protection request, we will respond within the time required by law. If we need further information from you to identify the information requested or to confirm your identity, the time for responding may be paused until we receive the clarification we reasonably need.

If you raise a concern or complaint with us about the way we have handled your personal information, we will acknowledge it as soon as possible, but no later than 30 days from receipt, and will investigate it in line with our complaints process. We will respond without undue delay, in line with our legal responsibilities.

We keep a record of data protection complaints so that we can investigate them properly and explain the outcome and any available escalation options.

You can change how we contact you, discuss our use of your personal information, or raise a concern or complaint with us using any of the contact methods below

By email: DPO@designability.org.uk Tel: **01225 824103**

In writing to: **The Data Protection Officer, Designability Charity Ltd, Wolfson Centre, Department D1, Royal United Hospital, Combe Park, BATH, BA1 3NG**

If you wish to make a complaint, you may also use our online form, in addition to the other contact methods listed above. Data Complaints Form – Fill in form

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can complain to the Information Commissioner's Office https://ico.org.uk/global/contact-us

Designability is registered with the Information Commissioner's Office under number Z6810677, is a Registered Charity under number 256335, and a Registered Company limited by guarantee under number 933932 (England and Wales)

Changes To Our Privacy Notice

Designability may update this Privacy Notice from time to time to reflect changes in the law, our research activities, or the way we handle personal information.

designability

This Privacy Notice is the latest published version. We will make updated versions available through our usual channels.

Date of Update	Reason
16/06/2025	To comply with the Data (Use and Access) Act 2025