



## IMPORTANT INFORMATION ABOUT US

This notice applies to Imagine the Day Limited (“The Lions”, “We”, “Us”, “Our”) who are the controller of, and responsible for, your personal data.

Imagine the Day Limited is registered as a data controller with the UK Information Commissioner, registration number ZB317908 and is a charity registered with the Charity Commission for England and Wales, number 1100673.

If You have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us at:

Email: [privacy@thelions.org.uk](mailto:privacy@thelions.org.uk)

Charity Address: The Rock, Vauxhall Street, Coventry, CV1 5LF

## PRIVACY NOTICE

We respect your privacy and are committed to protecting your personal data. This privacy notice will inform You as to how We look after your personal data when You visit our website (regardless of where You visit it from) and tell You about your privacy rights and how We protect you.

This privacy notice aims to give You information on how We collect and process your personal data through your use of this website.

### [Changes to the privacy notice and your duty to inform us of changes](#)

We keep our privacy notice under regular review. It is important that the personal data We hold about You is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

## THE TYPES OF DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information which relates to you. It could simply be your name and contact details, or it could also be our opinion of You as a potential customer and how We view You in marketing terms.

We may collect, use, store and transfer different kinds of personal data about You which We have grouped together as follows:

- **Identity Data** includes first name, last name, username or other identifiers e.g., social media username.
- **Contact Data** residential address, email address, telephone, mobile or direct message details
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices You use to access this website.



- **Profile Data** How We perceive You as a potential customer based on your interactions with us.
- **Usage Data** includes information about how You use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Special category data** including your religious and philosophical beliefs.

We may also collect, use and share aggregated data such as statistical or demographic data for any purpose. Whilst this may be derived from your personal data, it is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, We may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

#### Special categories of personal data

*Special categories of personal data include details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data.*

When applying for the Lions Program, We will infer, and You will explicitly provide, information regarding your Christian Faith. This personal data is processed with your explicit consent which We acquire from You when You apply.

#### Children

We do not target our website at children i.e., individuals aged under 18. If You are under 18, please do not use this website.

#### 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 data about you. We do not control these third-party websites and are not responsible for their management of your personal data. When You leave our website, We encourage You to read the privacy notice of every website You visit.

#### If You fail to provide required personal data

Where We need to collect personal data by law, or under the terms of a contract We have with you, and You fail to provide that data when requested, We may not be able to perform the contract We have or are trying to enter with you. In this case, We may have to cancel a product or service You have with us, but We will notify You if this is the case at the time.

## HOW YOUR PERSONAL DATA IS COLLECTED

We use different methods to collect data from and about you, depending on how You interact with us and our website.



### [Using our website](#)

As You interact with our website, We will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and similar technologies. Please see our Cookie Notice for further details.

### [Application for the Lions Program](#)

When applying for the Lions Program We will ask You to provide Us with personal data including identity data, contact data and information about your religious and/or philosophical beliefs. We will use this information for the purpose of assessing your eligibility to access the Lions Program.

Personal data which You place on the YouTube platform will be controlled by Google. We encourage You to visit your privacy settings on all social media platforms.

We require that You provide the contact details of other individuals who will act as Church and Work related 'referees'. We will use Our legitimate interests to process this information for the purpose of assessing your eligibility to the Lions Program. We encourage You to seek the permission of the referees before providing Us with their personal data.

### [Contacting us and/or registering for our marketing communications](#)

You may give us your identity and contact information by filling in forms or by corresponding with us by post, phone, email or otherwise.

We will use this information for the clearly stated purpose, e.g., responding to a request for our products or services.

We will always seek your consent to use this information for the purpose of unsolicited direct marketing. All unsolicited direct marketing will provide a simple opportunity for You to change your mind and opt-out of future channel-specific unsolicited marketing. Emails You receive from Us will always be relevant and We do not allow external companies to promote products to our mailing list.

### [Other parties or publicly available sources.](#)

We may receive personal data about You from third parties and public sources. We do this to enable us to meet our legal obligations e.g., credit referencing, AML etc.

## [DISCLOSURES OF YOUR PERSONAL DATA](#)

Where We share your personal data with other organisations to fulfil our obligations, We will always ensure that those parties are contracted by Us to provide specific, secure and privacy compliant data services.

We require all such parties to respect the security of your personal data and to treat it in accordance with applicable privacy law(s). We do not allow service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.



## INTERNATIONAL TRANSFERS

Some of the parties with whom We share your personal data may be based outside the UK; in this case their processing of your personal data will involve a transfer of data outside the UK. Whenever We transfer your personal data out of the UK, We ensure a similar degree of protection is afforded to it, by ensuring that:

- We only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data, or
- We use specific contracts, approved for use in the UK, which give personal data no less protection than it has in the UK.

In the absence of an adequacy decision or approved safeguards, we will consider derogations for specific situations e.g.,

- You provided explicit consent to the proposed transfer after being informed of any potential risks; or
- the transfer is necessary for one of the other reasons set out in the UK GDPR including the performance of a contract between Us and you, reasons of public interest, to establish, exercise or defend legal claims or to protect your vital interests where You are physically or legally incapable of giving consent and, in some limited cases, for Our legitimate interest.

Please contact us (see above for details) if You want further information on how We transfer your personal data out of the UK.

## DATA SECURITY

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

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

## HOW LONG WE WILL USE YOUR PERSONAL DATA FOR

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if We reasonably believe there is a prospect of litigation in respect to our relationship with you.



To determine the appropriate retention period for personal data, We consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which We process your personal data and whether We can

achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

## YOUR LEGAL RIGHTS

Under certain circumstances, You have rights under data protection laws in relation to your personal data. These rights are summarised below.

You have the right to:

- **Request access.** Commonly known as a “data subject access request”. This enables You to receive a copy of the personal data We hold about You and to check that We are lawfully processing it.
- **Request correction.** This enables You to have any incomplete or inaccurate data We hold about You corrected, though We may need to verify the accuracy of the new data You provide to us.
- **Request erasure.** This enables You to ask us to delete or remove personal data where there is no good reason for us continuing to process it. We may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing.** You may object to our processing where We are relying on a legitimate interest, and You feel the processing impacts on your fundamental rights and freedoms or where We are processing your personal data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process your information, which override your rights and freedoms.

Where personal data are processed for **direct marketing purposes**, You have the right to object at any time to processing of personal data concerning You for such marketing, which includes profiling to the extent that it is related to direct marketing.

- **Request restriction.** This enables You to ask us to suspend the processing of your personal data in the certain scenarios, such as if You want us to establish the data’s accuracy or where You have objected to our use of your data, but We need to verify whether We have overriding legitimate grounds to use it.
- **Request transfer.** We will provide to you, or another party You have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which You initially provided consent for us to use or where We used the information to perform a contract with you.



- **Right to withdraw consent.** Where We are relying on consent to process your personal data, You can withdraw this consent. However, this will not affect the lawfulness of any processing carried out before You withdraw your consent. If You withdraw your consent, We

may not be able to provide certain products or services to you. We will advise You if this is the case at the time You withdraw your consent.

If You wish to exercise any of the rights set out above, please contact us using the contact details above.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We suggest contacting us in the first instance to deal with your concerns, as We may be able to manage your concerns more quickly.

#### No access fee usually required

You will not normally have to pay a fee to access your personal data (or to exercise any of the other rights). We may charge a reasonable fee but only if your request is clearly unfounded, repetitive or excessive. We could also refuse to comply with your request in these specific circumstances.

#### What We may need from you

We may need to request specific information from You to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to protect You and ensure that personal data 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.

#### Time limit to respond

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

## OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, We will use your personal data in the following circumstances:

- Where We need the data to perform a contract We have (or are about to) enter into with you.
- 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 e.g., marketing our products and services.
- Where We need to comply with a legal obligation.
- Where We have your consent e.g., use of electronic mail contact details for unsolicited direct marketing.



Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
<p>To manage our relationship with you, which will include responding to your queries, getting feedback from you.</p>	<p>Identity, Contact, Profile, Usage and Marketing and Communications.</p>	<p>(a) To perform of a contract with you, or</p> <p>(b) because it is necessary to comply with a legal obligation, or</p> <p>(c) because it is necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).</p>
<p>To progress your application for the Lions Program</p>	<p>Identity, Contact, and special category data.</p>	<p>(a) To perform of a contract with you, or</p> <p>(b) We have a legitimate interest to assess your suitability to apply for our programs.</p> <p>(c) You have provided your explicit consent for the processing of special category data.</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>Identity, Contact and Technical.</p>	<p>(a) It is 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), or</p> <p>(b) It is necessary to comply with a legal obligation.</p>
<p>To use data analytics to improve our website,</p>	<p>Technical and Usage</p>	<p>(a) It is necessary for our legitimate interests (to define</p>



<p>products/services, marketing, customer relationships and experiences.</p>		<p>types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).</p>
<p>To make suggestions and recommendations to You about our related products or services that may be of interest to you.</p>	<p>Identity, Contact, Technical, Usage, Profile and Marketing and Communications.</p>	<p>(a) It is necessary for our legitimate interests (to develop our products/services and grow our business).</p>
<p>To meet our legal obligations, including but not limited to the prevention of crime and tax fraud.</p>	<p>Identity and Contact.</p>	<p>(a) It is necessary to comply with a legal obligation</p>

### Change of purpose

We will only use your personal data 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 We need to use your personal data for an unrelated purpose, We will notify You and We will explain the legal basis which allows us to do so.

Last updated 05 October 2022