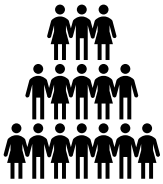
PRIVACY NOTICE

Effective Date
29/10/2026

WHO WE ARE

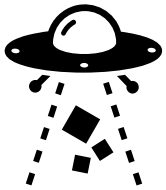
Your personal information is collected by women's Aid Luton. We respect your privacy and value the trust you place in us when you share your personal information.
More >

INFORMATION WE COLLECT ABOUT YOU



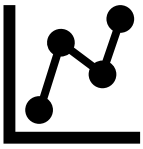
We collect personal information you give us such as your name, address, phone number, date of birth, gender, e-mail address, password, account settings and preferences.
More >

HOW WE COLLECT YOUR INFORMATION



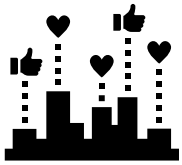
We collect your personal information when you set up a user account, buy our products and when you subscribe to email updates, newsletters or other subscriptions.
More >

HOW WE USE YOUR INFORMATION



We use your personal information to fulfil your order, to allow access to our website/mobile app, keep you up to date with latest offers and to ultimately offer you a better shopping experience.
More >

WHO WE SHARE YOUR INFORMATION WITH



We do share your information with third parties for various reasons, but all are required to respect the security of your personal information and to treat it in accordance with the law.
More >

HOW WE PROTECT YOUR INFORMATION

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.

More >

YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal information. If you wish to exercise any of the rights set out above, please contact us.

More >

HOW TO CONTACT US OR MAKE A COMPLAINT

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager.
Alternatively you have the right to make a complaint at any time to the Information Commissioner's Office.
More >

To download a pdf version of our privacy click *here*.

1. WHO WE ARE

Your personal information is collected by Women's Aid Luton, England, registered Charity No.1160555. We respect your privacy and are committed to protecting your personal information. This notice will inform you 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 the law protects you.

Changes to the privacy notice and your duty to inform us of changes

We keep our privacy notice under regular review. Historic versions can be obtained by contacting us at info@womensaidinluton.org.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your information changes during your relationship with us.

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 privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Children

While our website is designed for a general audience, we will not knowingly collect any data from children under the age of 13 or sell products to children. If you are under the age of 18, you are not permitted to register an account, use or submit your data to the website.

If we discover that we have collected any personal information from a child under the age of 18, we will suspend the associated account and remove that information from our database as soon as possible.

If you believe we might have any personal information from or about a person under the age of 18, please email us at info@womensaidinluton.org.

2. INFORMATION WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

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 similar identifier, title.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

- **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.
- **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 our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but 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. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal information which will be used in accordance with this privacy notice.

If you fail to provide personal information

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 into with you (for example, to provide you with goods or services). 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.

Special categories of personal information

Special categories of information that you give when using our services, including specifying your clothing size which may imply a medical condition. We use this information to provide our products and services.

Some personal information is treated as falling into a special category. This includes information about health, disability, race, ethnicity, political opinions, biometrics or religion.

We will use your health data where:

- this is necessary to enter into or perform our contract with you; or
- we have your explicit consent for the relevant purpose.

3. HOW WE COLLECT YOUR INFORMATION

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services
  - request marketing to be sent to you
  - request help solving technical issues
  - give us feedback or contact us
- **Automated technologies or interactions.** 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, server logs and other similar technologies. Please see our Cookie Policy for further details.

4. HOW WE USE YOUR PERSONAL INFORMATION

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 to perform the contract, we are about to enter into or have entered 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.
- Where we need to comply with a legal obligation.

To find out more about the types of lawful basis that we will rely on to process your personal data refer to the **GLOSSARY**.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we plan to use your data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data, where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer: (a) Create an account for you (b) Provide our products (c) Manage our systems (d) Prevent fraud (e) Send you marketing communications (f) Share this information with third parties if you have provided your consent to this	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (d) Consent

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To understand the way you use our products: (a) Identify products/services that may be of interest to you (b) Monitor usage of website and app (c) Provide location-based functions (d) Upload your photos and videos (e) Send notifications (f) Personalise our service (g) Statistical analysis and research (h) Improve our services (i) Develop new products and services	(a) Identity (b) Contact (c) Technical (d) Marketing and Communications	Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us (c) Foreign money exchange	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to recover debts due to us)
Information when you communicate with us whether in person, through our website or app, via email, over the phone, through social media or via any other medium. We use this to: (a) Answer any of your issues or concerns (b) Monitor customer communications for quality and training purposes (c) Develop new services (d) Improve our services based on the feedback you provide	(a) Identity (b) Contact (c) Transaction (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to provide a better service)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice (b) Resolving technical issues (c) Asking you to provide feedback on our service	(a) Identity (b) Contact (c) Technical (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data, and anti-money laundering checks).	(a) Identity (b) Contact (c) Technical	(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
To deliver relevant website content	(a) Identity (b) Contact (c) Usage (d) Marketing and Communications (e) Technical	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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define 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)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)
Information that we collect incidentally from other sources or public sources, including information presented on our social media or wider social media platforms including Facebook, Twitter and Instagram. We use this information, including to: (a) Maintain market awareness (b) Build and maintain social media branding	(a) Technical (b) Usage (c) Marketing and Communications	Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Third-party marketing - we will share your information with third parties for the purposes of direct marketing, to assist us with sending out the marketing communications, and managing your communication preferences.

Opting out - you can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

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 our Cookie Policy.

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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

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.

5. WHO WE SHARE YOUR INFORMATION WITH

There are certain circumstances where we transfer your personal information to other parties. For example we will:

- share aggregated, anonymised or other de-identified data with advertisers, advertising networks and social networks that require the data to select and serve relevant adverts to you and others. We will also use aggregate information to help advertisers reach the kind of audience they want to target
- make use of the personal information we have collected from you to help our advertisers display their advertisements to a target audience and to present our promotional messages to you. This means you will be presented with advertisements that are more likely to be relevant to you
- share your personal data with and access information from analytics and search engine providers that assist us in the improvement and optimisation of the website and app and for better personalisation of content and advertising

We share your information with certain contractors or service providers. They may process your personal data for us, for example, if we use a marketing agency. Other service providers include advertising agencies, IT suppliers, database providers, backup and disaster recovery specialists, and email providers.

Our suppliers and service providers will be required to meet our standards on processing information and security. The information we provide them, including your information, will only be provided in connection with the performance of their function. They will not be permitted to use your information for any purposes other than those outlined in this privacy notice.

We also share your information with certain third parties. We will do this either when we receive your consent or because we need them to provide you with advice and support, or to facilitate you providing donations / support to Women's Aid. These include:

- our marketing communications partner, MailChimp
- our fundraising partners JustGiving, SumUp etc.
- law enforcement agencies such as the Police

If we are not able to share your information with these third parties, we may not be able to provide you with the support, advice and safeguarding you require, or we may not be able to receive and process your donations / support.

Your personal information may be transferred to other third party organisations in certain scenarios:

- if we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police
- if we are defending a legal claim your information may be transferred as required in connection with defending such claim
- if there is an emergency which requires us to share your data to protect the health and safety of our website's or app's users or the general public

Your personal data may also be shared with third parties if it is made anonymous and aggregated. In such circumstances the information will cease to be personal data.

6. INTERNATIONAL TRANSFERS

We share your personal data our suppliers and service providers. This will involve transferring your data outside the European Economic Area (EEA). Many of our external third parties are based outside the EEA so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your information out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- In the absence of an adequacy decision or appropriate contractual safeguards we may rely on derogations for specific situations. For further details, see GDPR Article 49: Derogations for specific situations.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. HOW WE PROTECT YOUR INFORMATION

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 third parties who have a business need to know. They will only process your personal data on our instructions, and they are 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.

8. DATA RETENTION

How long will you use my personal information 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.

By law we have to keep basic information about our service users and supporters (including Contact, Identity, Financial and Transaction Data) for 6 years after they cease being service users for tax purposes.

In some circumstances you can ask us to delete your data.

Sometimes we will anonymise your personal data (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.

9. YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

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

If you wish to exercise any of the rights set out above, please contact us using info@womensaidinluton.org.

No fee usually required

You will not have to pay a fee to access your personal data (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 could refuse to comply with your request in these 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 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 a number of requests. In this case, we will notify you and keep you updated.

10. HOW TO CONTACT US OR MAKE A COMPLAINT

If you have any questions about this privacy notice or our privacy practices, please contact our data privacy manager at info@womensaidinluton.org.

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). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

11. GLOSSARY

Lawful Basis

Legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of a contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Consent means processing your data where you have freely given, specific, informed and unambiguous indication of your wishes.

Your Rights in Detail

You have the right to:

Request access to your personal data (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.

We are committed to providing the information you request as part of your Data Subject Access Request and have procedures in place to ensure this occurs in a timely fashion.

We do not have agreements in place with any third-party platforms that offer “Data Subject Access Requests as a Service”. As a responsible data controller of your personal information this represents significant risks when sharing data. The right of access afforded to you, does not obligate us to share data with third-parties. It is our policy to provide the information directly to data subjects ensuring the safety and security of the information throughout the process.

We will monitor future guidance from the Information Commissioner’s Office but will follow our reasonable measures to verify the identity of data subjects. We would like to assure you that the protection of your data is our main concern and we are committed to providing information as part of any valid request.

This policy will also apply to the rights set out below.

Request correction of the personal data that we hold about you. 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 of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that 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 of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object 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.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third 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.

Withdraw consent at any time where we are relying on consent to process your personal data. 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.