

Privacy Notice

The Children's Memorial Garden & Food Bank

Charity Number: 1180048

Last updated: August 2026

1. About this Privacy Notice

The Children's Memorial Garden & Food Bank ("Children's Memorial Garden", "we", "us" or "our") is committed to protecting your personal information and respecting your privacy.

This Privacy Notice explains how we collect, use, store and protect personal information when you:

- visit our website;
- contact us;
- visit or make arrangements to visit the Memorial Garden;
- become a supporter, volunteer or fundraiser;
- make a donation;
- participate in our activities or events;
- provide us with your story, photographs or other information;
- communicate with us through social media; or
- otherwise interact with the charity.

It also explains your rights under UK data protection law and how you can exercise them.

We are the **data controller** for the personal information we process for our own purposes.

The Children's Memorial Garden & Food Bank is a registered charity in England and Wales, charity number **1180048**.

Our current contact details are:

The Children's Memorial Garden & Food Bank

Lower Icknield Way
Princes Risborough
Buckinghamshire
HP27 9RL

Telephone: **07550 047203**

If you have a question about this Privacy Notice or the way we use your personal information, please contact us using the details above or through the contact facility on our website.

2. What personal information do we collect?

We aim to collect only the personal information that we reasonably need for the purposes explained in this notice.

Depending on how you interact with us, we may collect:

Contact information

This may include:

- your name;
- postal address;
- email address;
- telephone or mobile number;
- details of how you prefer to be contacted.

Supporter, volunteer and fundraiser information

If you volunteer, fundraise or otherwise support the charity, we may collect information such as:

- your name and contact details;
- the nature of your involvement;
- information about activities or events you participate in;
- relevant communications between you and the charity.

Donation information

When you make a donation, we may collect information needed to record and administer the donation, such as:

- your name;
- contact details;
- donation amount;
- date and method of donation;
- Gift Aid information, where applicable.

Payment information may be processed directly by a third-party payment or fundraising provider. We do not need to retain full payment card details where these are processed securely by the relevant payment provider.

The specific payment and fundraising providers used by the charity should be identified in this notice once confirmed.

Garden visits and enquiries

If you contact us about visiting the Memorial Garden, we may collect information necessary to arrange and manage your visit.

This may include your name, contact details and information necessary to communicate with you about your appointment.

The Garden is intended to provide a peaceful and private place for bereaved families and friends to remember their child. We therefore recognise that people contacting us may voluntarily disclose information about bereavement or other highly personal circumstances.

We do not require you to provide information about your bereavement or personal circumstances unless it is necessary for the service you have requested.

Please do not provide information that we have not requested unless you consider it necessary.

Stories, photographs and testimonials

If you choose to share your story, photographs, comments or other material with us, we may use this information to communicate the work and impact of the charity.

We will seek appropriate permission before publicly identifying you or publishing your story, photograph, quotation or testimonial where consent is required.

You do not have to agree to your story or photograph being used for publicity.

3. Information relating to children

The Children's Memorial Garden exists to support families and friends following the loss of a child.

We may therefore receive information relating to children, including information provided by parents, guardians or other family members.

We recognise that information about children requires particular care.

Where we process personal information relating to a living child, we will consider the child's rights and interests and will only collect and use information that is necessary and appropriate for the relevant purpose.

We will not routinely collect children's personal information for marketing purposes.

Where information relating to a deceased child is provided to us, we will treat that information with appropriate sensitivity and respect. Information relating to deceased individuals is not personal data for the purposes of the UK GDPR, but information about living family members and other individuals remains protected.

4. Information that may be particularly sensitive

Some information you provide to us may reveal information about your health, bereavement or other circumstances that may fall within the category of **special category personal data** under UK data protection law.

We will seek to minimise the collection of such information.

Where we genuinely need to process special category information, we will ensure that an appropriate additional legal condition applies and that the information is handled with appropriate safeguards.

We will not use sensitive information for unrelated purposes simply because it has been provided to us.

5. How we collect your information

We may collect personal information:

- directly from you;
- when you complete a form on our website;
- when you contact us by telephone, email or other means;
- when you make a donation;
- when you register as a volunteer, supporter or fundraiser;
- when you arrange a visit;
- when you provide information in connection with an event;
- when you communicate with us through social media; or
- from another person where they are legitimately providing information on your behalf.

If you provide personal information about another person, you should ensure, where appropriate, that they are aware of this Privacy Notice.

6. Why we use your personal information

We may use personal information to:

- respond to enquiries;
- arrange and administer visits to the Memorial Garden;
- provide information requested by you;
- administer supporter, volunteer and fundraising activities;
- process and record donations;
- administer Gift Aid where applicable;
- communicate with supporters;
- organise and administer events;
- maintain appropriate records;
- understand how people use and support our charity;
- improve our website and services;
- promote the work and charitable purposes of the organisation;
- comply with legal and regulatory obligations;
- protect our charity, visitors, supporters and others from fraud or misuse; and
- establish, exercise or defend legal claims where necessary.

We will not use your personal information for purposes that are incompatible with the purpose for which it was collected unless permitted or required by law.

7. Our lawful bases for processing

Data protection law requires us to have a lawful basis for processing personal information.

Depending on the circumstances, we may rely on:

Consent

We may ask for your consent where this is the appropriate legal basis, for example where we ask for permission to use your photograph, story or testimonial publicly, or where consent is required for certain forms of marketing.

Where processing is based on consent, you can withdraw that consent at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.

Legitimate interests

We may process personal information where it is necessary for our legitimate interests as a charity, provided that those interests are not overridden by your interests, rights or freedoms.

This may include:

- administering our charity;
- communicating with existing supporters;
- organising volunteers and fundraising activities;
- maintaining appropriate records;
- improving our services;
- protecting our property and systems; and
- managing and promoting our charitable activities.

Where we rely on legitimate interests, we will consider the impact on individuals and ensure that the processing is proportionate.

Contract or steps at your request

Where necessary, we may process personal information to provide something you have requested or to take steps at your request before entering into an arrangement with you.

Legal obligation

We may process information where necessary to comply with a legal obligation.

This may include obligations relating to:

- financial and accounting records;
- Gift Aid;
- charity administration;
- safeguarding;
- taxation; and
- responding to lawful requests from authorities.

Vital interests

In exceptional circumstances, we may process personal information where this is necessary to protect someone's vital interests.

8. Donations and financial records

We maintain appropriate records of donations and other financial transactions.

Where applicable, financial records may need to be retained for legal, accounting, taxation or regulatory purposes.

We will not retain personal information indefinitely simply because it was originally collected in connection with a donation.

Different categories of information will be retained for different periods depending on the purpose for which they are required.

Where there is no continuing legal, operational or legitimate reason to retain personal information, we will securely delete or anonymise it.

9. Sharing your personal information

We do not sell your personal information.

We may share personal information where this is necessary, lawful and proportionate.

This may include sharing information with:

- organisations that provide services to us;
- website and IT service providers;
- email or communication providers;
- payment and fundraising providers;
- professional advisers;
- auditors or accountants;
- insurers;
- government, regulatory or law-enforcement authorities where legally required;
- organisations involved in delivering services or support requested by you; and
- our charity partners where appropriate and lawful.

Charity partners

The Children's Memorial Garden has previously identified **The Compassionate Friends UK** as a charity partner.

Where we work with other organisations, we will determine whether they are acting as an independent data controller, joint controller or data processor, depending on the circumstances.

We will only share personal information where there is a lawful basis for doing so and where the information shared is appropriate for the relevant purpose.

Where we ask for your consent before sharing information with a particular organisation, we will explain this to you at the point at which the information is collected.

10. Third-party service providers

Like many charities, we may use specialist organisations to help operate our website and charity activities.

These may include providers of:

- website hosting;
- website security;
- email services;
- databases or CRM systems;
- payment processing;
- online fundraising;
- accounting;
- IT support;
- website analytics; and
- other technical services.

Where a provider processes personal information on our behalf, we will take appropriate steps to ensure that the provider is subject to appropriate contractual and security requirements.

The Children's Memorial Garden should insert the names of its principal providers here once these have been confirmed.

11. Transfers outside the UK

Some suppliers or online services used by the charity may process personal information outside the United Kingdom.

Where this occurs, we will ensure that any transfer is carried out in accordance with applicable UK data protection law and that appropriate safeguards are in place where required.

The relevant safeguards may include an adequacy decision or appropriate contractual safeguards.

12. Marketing and communications

We may communicate with supporters about:

- the work of the Children's Memorial Garden;
- developments at the Memorial Garden;
- fundraising activities;
- volunteering opportunities;
- events;
- charitable projects;
- news and updates; and
- opportunities to support our charitable purposes.

We will comply with applicable data protection and electronic marketing laws when sending marketing communications.

Consent

Where we rely on consent for electronic marketing, we will only send such communications where appropriate consent has been obtained.

You can withdraw your consent at any time.

Charitable purposes soft opt-in

Since **5 February 2026**, charities may in certain circumstances use the charitable purposes soft opt-in under the Privacy and Electronic Communications Regulations (PECR).

This can allow a charity to send electronic marketing without specific consent where:

- the charity has obtained the individual's contact details directly from them;
- the individual has expressed an interest in, or offered or provided support for, the charity's charitable purposes;
- the marketing is solely for the purpose of furthering the charity's charitable purposes;
- the individual was given a clear opportunity to opt out when their contact details were collected; and
- a clear and simple opportunity to opt out is provided in every subsequent communication.

We will only rely on this provision where all applicable legal requirements have been satisfied.

The ICO's current guidance confirms that the charitable-purpose soft opt-in commenced on 5 February 2026 and does not automatically apply to historic contacts simply because their details are already held by a charity.

We will maintain appropriate records of people's marketing preferences and the legal basis on which electronic marketing is sent.

You can opt out of our marketing communications at any time by using the unsubscribe facility provided in the communication or by contacting us.

13. Non-marketing communications

Even if you have opted out of marketing, we may still contact you where this is necessary for a non-marketing purpose.

For example, we may need to contact you about:

- a visit you have arranged;
- a donation;
- an event you have registered for;
- a request you have made;
- an administrative matter; or
- an important change affecting a service you are using.

14. Photographs, stories and publicity

We may wish to use photographs, stories, comments or testimonials to explain the work of the Children's Memorial Garden and demonstrate its charitable impact.

Where appropriate, we will ask for your permission before publishing material that identifies you.

If you give consent for your photograph, story or testimonial to be used publicly, you can normally withdraw that consent for future use.

Withdrawal will not necessarily enable us to retrieve or remove material that has already been published or distributed.

We will handle information relating to bereaved families sensitively and will not require someone to participate in publicity as a condition of receiving support or visiting the Memorial Garden.

15. Cookies and similar technologies

Our website may use cookies and similar technologies.

Cookies are small files that may be stored on your device when you visit a website.

We may use cookies that are:

- necessary for the operation and security of the website;
- used to remember preferences;
- used to understand how visitors use the website; or
- used for other purposes where permitted by law.

Where consent is legally required for a cookie or similar technology, we will ask for your consent before using it.

You can manage cookies through your browser settings and, where available, through our website's cookie settings.

The charity should maintain a separate **Cookie Notice/Cookie Policy** identifying the actual cookies and third-party technologies currently used on the website.

16. Social media

We may use social media platforms to communicate information about the charity, our activities, events and fundraising.

Our current social media presence may include platforms such as Facebook and other social media services.

When you interact with our social media pages, the relevant social media provider may collect and process personal information about you.

We do not control how those organisations process your personal information.

You should therefore review the privacy information provided by the relevant social media platform before using its services.

Where you communicate with us through social media, we may process information contained in your communication where necessary to respond to you or administer our activities.

17. How long we keep personal information

We keep personal information only for as long as we reasonably need it for the purpose for which it was collected or for another lawful purpose.

Retention periods will depend on the type of information and why we hold it.

For example:

- financial and donation records may need to be retained for statutory, accounting or taxation purposes;
- information relating to an ongoing relationship with a supporter may be retained while that relationship continues;
- marketing information will be reviewed periodically and removed or suppressed when it is no longer appropriate to retain or use it;
- information relating to a specific enquiry will normally be retained only for as long as reasonably necessary to deal with the enquiry and maintain an appropriate record.

Where personal information is no longer required, we will securely delete it or anonymise it where appropriate.

18. How we protect personal information

We take reasonable and appropriate technical and organisational measures to protect personal information against:

- unauthorised access;
- accidental loss;
- misuse;
- destruction;
- alteration; and
- inappropriate disclosure.

Measures may include:

- appropriate access controls;
- secure passwords and authentication;
- staff and volunteer awareness and training;
- secure storage;
- backups;
- software and system updates;
- appropriate security controls for our website and systems; and
- procedures for dealing with suspected data breaches.

No website, computer system or transmission over the internet can be guaranteed to be completely secure.

If you believe that your personal information may have been compromised or that there has been a data security incident involving us, please contact us as soon as possible.

19. Your data protection rights

Under UK data protection law, you may have a number of rights in relation to your personal information.

These include:

Right to be informed

You have the right to understand how your personal information is being collected and used. This Privacy Notice provides that information.

Right of access

You can ask us for a copy of the personal information we hold about you.

Right to rectification

You can ask us to correct inaccurate or incomplete personal information.

Right to erasure

In certain circumstances, you can ask us to delete your personal information.

This is sometimes known as the "right to be forgotten".

This right is not absolute. We may need to retain information where we have a legal or other lawful reason to do so.

Right to restrict processing

In certain circumstances, you can ask us to restrict the way we process your personal information.

Right to data portability

In certain circumstances, you can ask us to provide personal information you have provided to us in a structured, commonly used and machine-readable format, or ask us to transfer it to another organisation.

Right to object

You may have the right to object to certain types of processing, including direct marketing.

You can object to direct marketing at any time.

Rights relating to automated decision-making

We do not currently anticipate making decisions about individuals based solely on automated processing that produce legal or similarly significant effects.

If this changes, we will provide appropriate information about the processing and the rights that apply.

20. How to exercise your rights

If you want to exercise any of your data protection rights, please contact us using the contact details in this Privacy Notice or through our website's contact facility.

Please provide enough information to allow us to identify you and understand your request.

We may need to verify your identity before providing personal information or making changes to our records.

We will normally respond to a valid request **within one month**.

In some circumstances, the law allows this period to be extended, particularly where a request is complex or multiple requests have been made.

We will tell you if an extension is necessary.

You will not normally have to pay a fee to exercise your rights.

21. Complaints

We take concerns about privacy and the use of personal information seriously.

If you are unhappy about the way we have processed your personal information, please contact us first so that we have an opportunity to investigate and resolve your concern.

Please contact:

The Children's Memorial Garden & Food Bank

Lower Icknield Way
Princes Risborough
Buckinghamshire
HP27 9RL

Telephone: **07550 047203**

We will investigate your complaint and respond as soon as reasonably practicable.

You also have the right to complain to the **Information Commissioner's Office (ICO)**, which is the UK's independent supervisory authority for data protection.

The ICO can be contacted through its website or by telephone.

ICO website: ico.org.uk

ICO helpline: 0303 123 1113

We would, however, appreciate the opportunity to address your concerns before you contact the ICO.

22. Changes to this Privacy Notice

We may update this Privacy Notice from time to time to reflect:

- changes to our activities;
- changes to the way we process personal information;
- changes to our technology or suppliers;
- changes to data protection law or regulatory guidance; or

- improvements to the way we explain our privacy practices.

The latest version will be published on our website.

Last updated: August 2026

23. Important information for the Children's Memorial Garden

Before publishing this Privacy Notice, the charity should confirm and, where appropriate, add:

1. The charity's preferred privacy contact email address.
2. The actual website hosting provider.
3. The website platform/provider.
4. The email marketing provider.
5. The donation/payment provider.
6. Any fundraising platforms used.
7. Any analytics services used on the website.
8. The actual cookies currently installed.
9. All social media platforms currently operated by the charity.
10. Any other organisations regularly receiving personal information.
11. Whether volunteers have access to personal information and what controls apply.
12. Whether any information is transferred outside the UK through third-party providers.
13. The exact process for visitors/families requesting access to or deletion of their information.

These details should