

# AoLP Privacy Notice

## AT THE AOLP WE'RE COMMITTED TO PROTECTING AND RESPECTING YOUR PRIVACY.

This notice explains when and why we collect personal information about you, how we use it, the conditions under which we may disclose it to others, how we keep it safe and secure and your rights and choices in relation to your information. This notice applies to all website, software, purchases and subscriptions.

Please read the policy carefully and contact us with any questions or concerns about our privacy practices, your personal information, or if you wish to file a complaint.

Any questions regarding this policy and our privacy practices should be sent by email to [info@aolp.co](mailto:info@aolp.co) or by writing to Head of Customer Services, AoLP, 9 Franklin Way, Spilsby, Lincolnshire, PE23 5GG.

## WHO ARE WE?

We're AoLP, the international training provider dedicated to helping people to make the most of life and money.

In this policy 'AoLP, 'we', 'us' or 'our' means the Academy of Life Planning Limited, registered in England and Wales (no. 8016568). Registered address is 9 Franklin Way, Spilsby, Lincolnshire, PE23 5GG..

## HOW DO WE COLLECT INFORMATION ABOUT YOU?

We obtain information about you in the following ways:

- Information you give us directly
- Information you give us indirectly
- When you visit this website
- Social media
- Public information

## WHAT TYPE OF INFORMATION IS COLLECTED ABOUT YOU?

The personal information we collect, store and use might include:

- your name and contact details (including postal address, email address and telephone number) when registering, purchasing or otherwise using our services. You complete a contract form or sign up to a newsletter.
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location;
- your bank or credit card details. If you make a purchase, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions; and
- any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity and religion. We do not usually collect sensitive data about you unless there is a clear and valid

reason for doing so and data protection laws allow us to. Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for.

## HOW AND WHY IS YOUR INFORMATION USED?

We may use your information for a number of different purposes, which may include:

- providing you with the services, products or information you asked for.
- processing orders that you have submitted;
- carrying out our obligations under any contracts entered into between you and us;
- keeping a record of your relationship with us;
- conducting analysis and market research to better understand how we can improve our services, products or information;
- checking for updated contact details against third party sources so we can stay in touch if you move (see the section on 'Keeping your information up to date' below);
- seeking your views or comments by polls and surveys on the services we provide;
- internal research and development purposes;
- notifying you of changes to our services;
- sending you marketing and event communications which you have requested and that may be of interest to you. These may include information about campaigns, activities and promotions of goods and services;
- personalising content, business information or user experience;
- legal obligations (e.g. prevention of fraud); and
- meeting internal audit requirements.

## LEGAL BASIS

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

- We rely on your consent to keep you informed of events and publications, you may withdraw this at anytime by contacting us on the link provided, emailing us at [info@aolp.co](mailto:info@aolp.co) or writing to us at the address provided.
- We also rely on the contract you enter into in order to fulfil your request for the provision of products or services.
- We also may be required from time to time to process information on account of our legal obligations to do so.

## WHEN DO WE SHARE PERSONAL DATA?

We treat personal data confidentially.

We do not sell or rent your information to third parties.

We do not share your information with third parties for marketing purposes.

However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy. These third parties may include:

- our customer relationship management system provider, for the purpose of controlling and tracking our relationship with you to ensure that we perform our duties and responsibilities in a timely manner and meet your expectations in terms of service delivery.
- our lifetime cash flow management software service provider as part of the Financial Freedom Forecaster <sup>TM</sup>.

We have safeguards in place to ensure that our suppliers meet similar standards and obligations and have satisfactory policies in place to protect the privacy and security of your data.

## WHERE DO WE STORE AND PROCESS PERSONAL DATA?

We aim to store and process data in the United Kingdom. We ensure the data is processed in accordance with our privacy policy and the law of the United Kingdom.

As part of the services offered to you through this website, the information which you provide to us may have to be transferred to countries inside or outside the European Economic Area ("EEA"). By way of example, this may happen if any of our servers are from time to time located in a country outside of the EEA. You should be aware that these countries may not have similar data protection laws to the UK. By submitting your personal data, you're agreeing to this transfer, storing or processing. If we transfer your information outside of the EEA in this way, we will take steps to ensure that appropriate security measures are taken, e.g. contractual clauses, data transfer agreements, etc, with the aim of ensuring that your privacy rights continue to be protected as outlined in this policy.

If you use our services while you are outside the EEA, your information may be transferred outside the EEA in order to provide you with those services.

We undertake regular reviews of who has access to information that we hold to ensure that your info is only accessible by appropriately trained staff, volunteers and contractors.

## HOW DO WE KEEP YOUR INFORMATION SAFE?

When you give us personal information, we take steps to ensure that appropriate technical and organisational controls are in place to protect it.

Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software: 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

We have in place further measures:

- to protect data against accidental loss;
- to prevent unauthorised access, use, destruction or disclosure;
- to ensure business continuity and disaster recovery;
- to restrict access to personal information;
- to conduct privacy impact assessments in accordance with the law and our business policies;
- to train staff and contractors on data security; and
- to manage third party risks, through use of contracts and security reviews.

## HOW LONG IS YOUR INFORMATION KEPT FOR?

We keep your information for no longer than is reasonably necessary for the particular purposes it was collected for. The length of time we retain your personal information for is determined by contractual, operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and tax/accounting purposes). We securely dispose of data after we no longer need it. We review our retention periods on a regular basis.

## YOUR RIGHTS IN RELATION TO PERSONAL DATA

Under UK data protection law, you have certain rights to access and control the personal information that we hold about you. Here is a summary of the rights that we think apply:

- Right of access to personal information;
- Right to have inaccurate personal information corrected or deleted;
- Right to withdraw your consent to processing data (when we process data on condition of your consent);
- Right for your personal information to be portable; and
- Right to object or lodge a complaint with the Information Commissioner's Office.

If you want to exercise any of the above rights, please email us at [info@aolp.co](mailto:info@aolp.co) or write to Head of Customer Services, AoLP, 9 Franklin Way, Spilsby, Lincolnshire, PE23 5GG. We may be required to ask for further information and/or evidence of identity. We will endeavour to respond fully to all requests within one month of receipt of your request, however if we are unable to do so we will contact you with reasons for the delay.

Please note that exceptions apply to a number of these rights, and not all rights will be applicable in all circumstances. For example, rights may be limited, e.g. if fulfilling the data subject request may expose personal data about another person, or if we're asked to delete data which we are required to keep by law.

For more details we recommend you consult the guidance published by the UK's [Information Commissioner's Office](#).

## MARKETING AND FUNDRAISING COMMUNICATIONS

We may use your contact details to provide you with information about the vital work we do for people who struggle with life and money, our fundraising appeals and opportunities to support us, as well as the products and services you can buy, if we think it may be of interest to you.

### **Email/text/phone**

We will only send you marketing and fundraising communications by email, text and telephone if you have explicitly provided your prior consent. You may opt out of our marketing communications at any time by clicking the unsubscribe link at the end of our marketing emails.

### **Post\***

We may send you marketing and fundraising communications by post unless you have told us that you would prefer not to hear from us.

## YOUR CHOICES

You have a choice about whether or not you wish to receive information from us. If you do not want to receive direct marketing communications from us about the vital work we do for people who struggle with life and money and the exciting products and services you can buy, then you can select your choices by ticking the relevant boxes situated on the form used to collect your information.

We're committed to putting you in control of your data so you're free to change your marketing preferences (including to tell us that you don't want to be contacted for marketing purposes) at any time using: [info@aolp.co](mailto:info@aolp.co) , or by telephone: 01790 754743, or post: Head of Customer Services. AoLP, 9 Franklin Way, Spilsby, Lincolnshire, PE23 5GG.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted and will retain your details on a suppression list to help ensure that we do not continue to contact you. However, we may still need to contact you for administrative purposes like where we are processing a donation or thanking you for your participation in an event.

## USE OF AUTOMATED DECISION-MAKING AND PROFILING

We may analyse your personal information to create a profile of your interests and preferences so that we can tailor and target our communications in a way that is timely and relevant to you. We may make use of additional information about you when it is available from external sources to help us do this effectively. This allows us to be more focused, efficient and cost effective with our resources and also reduces the risk of someone receiving information they may find inappropriate or irrelevant.

We're committed to putting you in control of your data so you're free to opt out of your information being used in this way at any time by contacting [info@aolp.co](mailto:info@aolp.co)  
We may also use your personal information to detect and reduce fraud and credit risk.

## KEEPING YOUR INFORMATION UP TO DATE

We take reasonable steps to ensure your information is accurate and up to date. Where possible we use publicly available sources to identify deceased records or whether you have changed address. We really appreciate it if you let us know when your contact details change.

## USE OF 'COOKIES' AND OTHER TECHNOLOGIES

Like many other websites, this website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. For example, we use cookies to store your country preference. This helps us to deliver a more personalised service when you browse our website and improves our services.

It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website.

If you use Facebook or our website, AoLP may show you content we think you will be interested in seeing, based on your previous online engagement with us.

We may also use these cookies to build “lookalike” audiences, in order to reach more individuals who might be interested in the work AoLP does.

## **LINKS TO OTHER WEBSITES**

Our website may contain links to other websites run by other organisations. This policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access those using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the privacy policy of that third-party site.

## **MINOR CHILDREN**

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

## **VULNERABLE ADULTS**

We are committed to protecting vulnerable supporters, customers and volunteers, and appreciate that additional care may be needed when we use their personal information. In recognition of this, we observe good practice guidelines in our interactions with vulnerable people.

## **CHANGES TO THIS POLICY**

Any changes we may make to this policy in the future will be posted on this website so please check this page occasionally to ensure that you're happy with any changes. If we make any significant changes, we'll make this clear on this website.

We keep this policy under regular review. This policy was last updated in May 2021.