**COMMENCE CIC**  
**Privacy Policy**

**1. Introduction**  
Commence CIC is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, store, and protect your personal information in compliance with relevant data protection laws, including the General Data Protection Regulation (GDPR). By using our services, you agree to the practices described in this policy.

**2. Scope**  
This policy applies to all individuals whose personal data is collected by Commence CIC, including clients, staff, volunteers, event participants, and anyone else who engages with our services or activities.

**3. Personal Data We Collect**  
We collect personal data that is necessary for providing our services and ensuring the smooth running of our activities. The types of personal data we may collect include:

* **Contact Information**: Name, email address, phone number, home address.
* **Health and Well-being Information**: For specific services (e.g., therapeutic massage, mindfulness activities), we may collect relevant health or medical information (e.g., allergies, disabilities, pre-existing conditions). This is only collected with your explicit consent and for the purpose of delivering safe and effective services.
* **Demographic Information**: Age, gender, occupation, and other relevant demographic information.
* **Emergency Contact Information**: Name, relationship to you, phone number, and other details for use in case of an emergency.
* **Payment and Transaction Information**: Payment details (such as bank or card information) when you make a donation or payment for services.
* **Activity Participation**: Records of the services you have participated in, including session dates, feedback, and outcomes, where applicable.

**4. How We Collect Personal Data**  
We collect personal data in the following ways:

* **Directly from You**: We collect information when you register for services, sign up for events, contact us for support, or interact with us via our website or in-person.
* **Automatically**: When you use our website or online services, certain data is automatically collected, including your IP address, browser type, and usage data (e.g., pages visited, links clicked). This data is used to improve our website functionality and user experience.
* **From Third Parties**: In some cases, we may receive personal data from third parties (such as event organizers, partners, or your healthcare provider), but we will always seek your consent before using this data.

**5. Use of Personal Data**  
We use your personal data to provide you with the best service and support. The main purposes for which we use your data include:

* **Service Delivery**: To provide the services you request (e.g., therapeutic massage, mindfulness sessions), including coordinating appointments, delivering activities, and managing your health and safety during these services.
* **Communication**: To contact you about your participation in activities, sessions, or events, send you information about upcoming services, and respond to your inquiries.
* **Emergency and Health Support**: To respond to any medical or emergency situations that may arise during services or activities, ensuring that you receive appropriate care.
* **Improvement of Services**: To analyze feedback, gather insights, and improve the quality and effectiveness of our services.
* **Legal and Regulatory Compliance**: To comply with any legal, regulatory, or contractual obligations, including record-keeping requirements and responding to requests from authorities.
* **Marketing and Updates**: With your explicit consent, we may use your data to send you information about new services, events, or initiatives offered by Commence CIC. You can opt-out of marketing communications at any time.

**6. Legal Basis for Processing Personal Data**  
We process your personal data based on the following legal grounds:

* **Consent**: When you give us explicit consent to collect and use your data (e.g., for health information, marketing communications).
* **Contractual Necessity**: When we need to process your data to fulfill our obligations to you under a contract (e.g., delivering a service, scheduling an appointment).
* **Legal Obligation**: When we are required to process your data to comply with legal obligations (e.g., record-keeping or reporting requirements).
* **Legitimate Interests**: When we process your data based on legitimate interests (e.g., improving services, conducting research), provided these interests do not override your rights and freedoms.

**7. Data Sharing and Disclosure**  
We may share your personal data in the following circumstances:

* **Service Providers**: We may share your data with trusted third-party service providers who assist us in delivering services, such as payment processors, healthcare professionals, or technology providers. These parties will only use your data for the purposes outlined in this policy and will be required to protect your data in accordance with applicable laws.
* **Legal Compliance**: We may disclose your personal data if required by law or to respond to legal requests, such as a subpoena, court order, or regulatory inquiry.
* **Emergency Situations**: In case of an emergency (e.g., medical or safety situation), we may share your data with emergency responders or medical professionals as needed to ensure your well-being.

**8. Data Security**  
We are committed to ensuring the security of your personal data. We take appropriate technical and organizational measures to protect your data against unauthorized access, alteration, disclosure, or destruction. These measures include encryption, access controls, and regular security audits.

**9. Data Retention**  
We will retain your personal data only for as long as necessary to fulfill the purposes outlined in this policy or as required by law. Once your data is no longer needed, it will be securely deleted or anonymized.

**10. Your Rights Over Your Data**  
Under data protection law, you have certain rights regarding your personal data:

* **Right to Access**: You have the right to request a copy of the personal data we hold about you.
* **Right to Rectification**: You have the right to correct any inaccuracies in your personal data.
* **Right to Erasure**: You have the right to request that we delete your personal data, subject to certain exceptions.
* **Right to Restrict Processing**: You have the right to ask us to limit the processing of your data in certain circumstances.
* **Right to Object**: You have the right to object to the processing of your data for certain purposes, including marketing.
* **Right to Data Portability**: You have the right to request a copy of your personal data in a machine-readable format for transfer to another organization.

If you wish to exercise any of these rights, please contact us using the details provided below.

**11. Third-Party Links**  
Our website or services may contain links to third-party websites. Please be aware that this Privacy Policy does not apply to such third-party websites, and we are not responsible for their content or privacy practices. We encourage you to review the privacy policies of any third-party sites you visit.

**12. Changes to This Privacy Policy**  
Commence CIC may update this Privacy Policy from time to time. Any changes will be communicated to you through our website or other appropriate channels. The revised policy will be posted on our website, and the "Effective Date" at the top of the policy will be updated.

**13. Contact Us**  
If you have any questions or concerns about this Privacy Policy or how your personal data is being used, please contact us:

**Commence CIC**  
Email Commencecic@hotmail.com

**Date Adopted: 16/02/2025**  
**Signed by:** Maryam Seyad  
**Position:** Founder

**Commence CIC**