

Date Last Reviewed:

See full review and responsibility schedule [here](#)

It is the responsibility of the Board of Vox Liminis to review any policies in line with current legal and best practice guidance. Any learning or actions from any breaches or incidents occurring from the last review will be implemented into the policy. Where any incident requires to be reported to an external body, or where investigation or disciplinary procedures are required, the Board, or the Chair of the Board at the very least, will be notified.

Notice Purpose and Statement

Vox Liminis respect your privacy and are committed to protecting your personal data. This privacy notice aims to inform you how:

- Vox Liminis collect and process your personal data through use of this site, including any data you provide
- Vox Liminis look after your personal data when you visit our website (regardless of where you visit it from)
- how the law protects you and your privacy rights.

By visiting www.voxliminis.co.uk and www.distantvoices.org.uk you are accepting and consenting to the practices described in this policy. These websites are not intended for children, and we do not knowingly collect data relating to children.

Data Controller

This Website www.voxliminis.co.uk and our associated web pages, is operated by Vox Liminis, a company incorporated by guarantee (SC455215) and a registered charity (SC044344) and having our registered office at Glasgow Collective, 217 Gallowgate, Glasgow, G1 5DX ('we' and 'our').

For the purposes of the Data Protection Act 1998, we are the "data controller" (i.e. the company who is responsible for, and controls the processing of, your personal data).

Any questions in relation to this Privacy Notice, including any requests to exercise your legal rights should be emailed to admin@voxliminis.co.uk.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority 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.

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.

Collection of Personal Information

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 follows:

Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- Contact Data includes your email address, billing address, delivery address, and telephone numbers.
- Profile Data includes your username and password, purchases or orders made by you for Events or media, your interests, preferences, feedback, and survey responses
- Technical Data includes your home server domain name, operating system, and type of web browser you used, internet protocol (IP) address, your login data, time zone setting and location, browser plug-in types and versions, and other technology on the devices you use to access this website
- Usage Data includes aggregate and user-specific information on which pages you view, content searched for, page response times, length of visits to certain pages, page interaction information
- Financial Data includes any payment information and financial details you provide in order to use the Website.
- 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 may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences. We request that you do not enter any special categories of data when using the interactive features of our website. If you volunteer any special category personal data whilst using our website, we will process it in accordance with this Privacy Policy.

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.

How we collect Personal Data

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

- Direct interactions. You may give us your name, 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
 - register for and create an account on our website
 - sign up for an event run by us or our affiliates
 - subscribe to our service or publications
 - engage with interactive features of our website, including groups and networks
 - request marketing to be sent to you
 - enter a competition, promotion, or survey
 - provide feedback
 - report a problem with our site
- Automated technologies or interactions. As you interact with our website, we may 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 below for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties [and public sources] as set out below:
 - analytics providers
 - advertising networks
 - search information providers
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators
- Identity and Contact Data from publicly available sources (such as Companies House and the Electoral Register based inside the EU).

Use of Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse this site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Further information on deleting or controlling cookies is available at www.AboutCookies.org.

We use the following cookies:

- Strictly necessary cookies. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, sign up for events or make payments.
- Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.
- Functionality cookies. These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

- Targeting cookies. These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

Cookie set by	Reason for use
Google Analytics and Google Tag Manager	We collect anonymous information about all website visitors in order to understand how the website is being used and this helps us improve your user experience. For more information please visit http://www.google.com/analytics/learn/privacy.html
YouTube	We embed videos on our website using an external website called YouTube. In order to understand how many times videos have been watched we collect some anonymous information.
Facebook	We collect information about the behaviour of visitors who visit our website from some of our Facebook posts and adverts. This information may be used for measurement services and to target advertising.
Soundcloud	We embed audio content on our website using an external website called Soundcloud. In order to understand how many times videos have been watched we collect some anonymous information. We embed podcast content on our website using an external website called Soundcloud. In order to understand how many times videos have been watched we collect some anonymous information.
MailChimp	We use an email marketing platform called MailChimp which we use to send marketing emails to members who have opted into receiving emails. Website usage information is collected if links are clicked, and we use this to enhance our targeting of content.

If you have logged in to our website, we use some session cookies to remember who you are and to allow you to access secure areas of the site:

Type of cookie	Reason for use
Session cookies	These cookies are used for the login process to keep you logged in to the website. Without these cookies the website will not function correctly, and you will not be able to login to the secure areas of the website or visit our virtual networks.

Using 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 to perform the contract we are about to, 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 or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to 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 unsubscribing by clicking the link in any of our emails or by contacting us at admin@voxlminis.co.uk.

Purposes of Use of Personal Data

We have set out in the table below a description of all the ways we plan to use your personal 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 member or registered user	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your orders or donations on this website, for events and products, including: (a) Manage payments, fees and charges (b) Collect and recover money owed (c) Direct Debit credit reference checking	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey including sending an email asking you to rate your experience of using our Portal (c) providing you with information for and asking for feedback about an event you registered for on our site	(a) Identity (b) Contact (c) Profile (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)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) and to ensure that content from our site is presented in the most effective manner on your computer	(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 and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) 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 goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

Disclosure of your personal data

When you contribute content to public or shared areas of our website you will be credited as the contributor using the name you supply at the point of submission. This accreditation will appear on the service and will therefore be visible to other users.

We may have to share your personal data with the parties set out below for the purposes set out in the table in above.

- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party 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.

Marketing

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

Promotional offers from us

We may use your identity, contact, technical, usage and profile data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have opted in to receiving that marketing.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any company outside Vox Liminis for marketing purposes.

Opt-out options

You can ask us or third parties to stop sending you marketing messages at any time by editing your preferences at www.mailchimp.com or by emailing admin@voxliminis.co.uk.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase including registration for our applications, product/service experience or other transactions.

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.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Interactive Services

There are parts of our website which permit registered users to post user generated content. All content posted in such areas must comply with our '[Website - Terms of Use' Policy](#). We ask you not to enter content which contains personal information.

International transfer of data

We do not transfer your personal data outside the European Economic Area (EEA).

Security Measures

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 instruction and they are subject to a duty of confidentiality.

Where you have access to a secure area of the website you are responsible for keeping your login details and password(s) confidential and protected. We ask you not to share your password with anyone. You can change your password at any time by logging in. We accept no responsibility or liability if a third party obtains and uses your ID or password. You must tell us immediately if you believe someone may have access to or use of this information.

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.

Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

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

In some circumstances you can ask us to delete your data: see 'Your legal rights' section below for further information.

In some circumstances we may 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.

Your Legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. 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.
- 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: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) 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; or (d) 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.

If you wish to exercise any of the rights set out above, please contact admin@voxliminis.co.uk or using the contact details set out at the beginning of this document.

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 may refuse to comply with your request in these circumstances.

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.

Response Times

We try to respond to all legitimate requests within one month. Occasionally it may 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.