



Somerset and Avon Rape and Sexual Abuse Support External Privacy Notice

Last Updated: July 2025

Next Review: July 2027

1. Who we are and what we do

Who we are

We are Somerset and Avon Rape and Sexual Abuse Support ("SARSAS", "us", "we", "our"). We are a charity registered in England and Wales under registration number 1126682 and we have our registered office at PO Box 2942 Bristol BS1 9EU. We are registered with the UK supervisory authority, Information Commissioner's Office ("ICO"), in relation to our processing of Personal Data under registration number Z3052622.

What we do

We provide specialist support services for people who have experienced any kind of sexual violence at any time in their lives. We are committed to protecting the privacy and security of the Personal Data we process about you.

Controller

Unless we notify you otherwise, we are the controller of the Personal Data we process about you. This means that we decide what Personal Data to collect and how to process it.

2. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

3. Who this privacy notice applies to

This privacy notice applies to you if:

1. You visit our website
2. You use our services
3. You are a partner or a supplier



4. You enquire about our services
5. You sign up to receive newsletters and/or other promotional communications from us

4. What Personal Data is

‘Personal Data’ means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

‘Special Category Personal Data’ is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone’s sex life or sexual orientation.

5. Personal Data we collect

The type of Personal Data we collect about you will depend on our relationship with you. For the type of Personal Data we collect, see the table below in the section entitled ‘Purposes, lawful bases and retention periods’.

6. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

However, we may also collect your Personal Data from third parties such as:

- professional referrers
- others to whom you have provided consent.

7. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Partner / Supplier	Name, Work email address, Job Title	To facilitate effective communication regarding business operations, including updates, inquiries, and coordination of services	Legitimate interests	3 years
Business Associate	Name, job title, work email address, work phone number, company you work for, communication preferences	To send you newsletters and other promotional material	Legitimate interests	2 years following last meaningful contact
Website user	Website usage and User preferences	To understand how users engage with the SARSAS website. For more information, please refer to our cookie policy .	Consent	1 year
Website user	Username, Password,	To use our SSA survivor forum	Consent	Until account deletion

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.

8. Sharing your Personal Data

SARSAS will not, without the explicit consent of the data subject, share Personal Data with any third party unless the sharing is strictly for the performance of SARSAS' operational functions (e.g., outsourcing of business functions); unless the sharing is required by law or statute; or otherwise, legitimate without consent as set out in the UK GDPR.

Third parties may include IT providers, payroll bureau, SV alliance partners, medical professionals, professionals providing statutory care, criminal justice professionals.

Situations when it may be necessary to break confidentiality

- when a child or adult with care and support needs is at risk of harm through abuse or neglect (see Child Safeguarding Policy and Safeguarding Adults Policy)
- when there is a serious risk of harm to the service user or others
- when there is a court order or other legal requirements.

The decision on whether to break confidentiality will be decided on a case-by-case basis and always in agreement with the CEO, or in their absence, the Designated Safeguarding Lead (DSL).

When we engage third parties, we will conduct robust third party due diligence to ensure third parties are able to comply with their responsibilities under data protection laws to protect personal data provided to them.

We may also pass aggregated information on to third parties (including funders) for reporting and analysis purposes, but this will not include any identifying information.

9. International Transfers

Your Personal Data may be processed outside of the UK. This is because the organisations we use to provide our service to you are based outside the UK.

We have taken appropriate steps to ensure that the Personal Data processed outside the UK has an essentially equivalent level of protection to that guaranteed in the UK. We do this by ensuring that:

- Your Personal Data is only processed in a country which the Secretary of State has confirmed has an adequate level of protection (an adequacy regulation), or

- We enter into an International Data Transfer Agreement (“IDTA”) with the receiving organisation and adopt supplementary measures, where necessary. (A copy of the IDTA can be found here [international-data-transfer-agreement.pdf \(ico.org.uk\)](https://ico.org.uk/for-organisations/data-protection/international-data-transfer-agreement.pdf)).

10. Marketing Communications

From time to time, with your consent we may use your information to contact you with details about our products and services which we feel may be of interest to you. You have the right at any time to stop us from contacting you for marketing purposes. If you wish to exercise these rights you can do so by following the ‘unsubscribe’ link on any emails received or contacting us at Info@sarsas.org.uk.

11. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will

stop sending you marketing material.

- **Right to restrict processing**

You have the right to restrict our use of your Personal Data.

- **Right to portability**

You have the right to ask us to transfer your Personal Data to another party.

- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.

- **Right to withdraw consent**

If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.

- **Right to lodge a complaint**

You have the right to lodge a complaint with the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal Data. The supervisory authority in the UK is the Information Commissioner's Office who can be contacted online at:

[Contact us | ICO](#)

Or by telephone on 0303 123 1113

How to exercise your rights

You will not usually need to pay a fee to exercise any of the above rights. However, we may charge a reasonable fee if your request is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may

need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

12. Children's Privacy

SARSAS does not need to obtain parental consent when offering preventative or counselling services to individuals aged between 13 and 18. SARSAS recognises that children within this age group (who have deemed competency) have full rights regarding their data and as such must provide appropriate consent.

We will take steps to ensure the best interests of the child are our primary consideration (UN Convention on the Rights of the Child – Article 3) and do our best to explain data protection and its implications in a language they understand.

We will:

- tell them what we are doing with their data,
- be open about the risks and safeguarding issues involved
- let them know what to do if they're unhappy.

We will make reasonable efforts to verify the age of any child to ensure they are over 13 (for example: asking for date of birth, year at school).

13. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact us as follows:

PO Box 2942, Bristol BS1 9EU

Info@sarsas.org.uk

We have also appointed a Data protection Officer ("DPO"). Our DPO is Evalian Limited and can be contacted as follows:

dpo@evalian.co.uk

Please mark your communications FAO the 'Data Protection Officer'.



*Listen.
Believe.
Support.*

14. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes where required by applicable law to do so.

Last modified: July 2025