DATA PROTECTION & PRIVACY POLICY

Last updated: 14 November 2026

1. Purpose of This Policy

Neuromodulation Community Interest Company ("we", "our", "the CIC") is committed to protecting the privacy and personal data of our community, members, donors, volunteers, advisors, and partners. We are a small UK-based non-profit and we follow the UK GDPR and the Data Protection Act 2018. We are the "data controller" for the personal data described in this policy.

This policy explains:

- What personal data we collect and why
- Who we share it with
- How we store it and how long we keep it
- Your rights under UK law

2. What Personal Data We Collect

We collect only what we need for our current activities. Depending on how you interact with us, this may include:

- **Membership sign-ups:** your email address, and a record of when and how you agreed to hear from us.
- **Contact and partner enquiries:** your name, email address, organisation, and the message you choose to send.
- **Story submissions:** your first name, country, email address, photo, quote and story, which therapy it relates to, and whether you would like your name shown. Stories often describe health experiences, which is "special category" data (see section 4).
- **Donations:** if you donate through our donation page, the payment is handled by Zeffy (see section 6). We receive your name, email address and donation details so we can thank you and keep our records. We never see your full card details.
- **Volunteers, advisors and committee members:** contact details, participation details, and optional accessibility needs.
- **Anything else you choose to tell us.**

We do not ask for medical records. We do not need your health information to join our mailing list or to contact us, and we ask that you do not include other people's names or personal details in anything you send us.

Our website itself does not use advertising or analytics cookies. See section 11 for third-party content that may load on some pages.

3. How We Use Your Data

We use personal data only to:

- Send you updates, newsletters and surveys you have signed up for (you can unsubscribe at any time)
- Reply to your messages and enquiries
- Review stories with you and, with your approval, publish them
- Process and acknowledge donations, and keep records of them

- Communicate with volunteers, advisors and committee members and organise meetings, programmes and community activities
- Ensure accessibility and inclusion, meet safeguarding and legal duties, and maintain internal records

We do not sell your data, share it with third parties for their marketing, or use automated decision-making.

4. Legal Basis for Processing

Under UK GDPR, our legal bases are:

- **Consent:** for our mailing list, for publishing your story, photo and quote, and for any health information you choose to share with us. Where a story includes health information, we rely on your explicit consent. You can withdraw consent at any time.
- **Legitimate interests:** for replying to enquiries, handling partner and donor communications, and running our non-profit activities, where this does not override your rights.
- **Legal obligation:** where we must keep records or share information by law, for example for accounting or safeguarding.

5. Stories, Photos and Quotes

Nothing you send us through the “Share your story” form is published without your approval. Our team will contact you by email with the final version of your photo and quote before anything goes live. Your email address is never published. You can ask us to change, anonymise or remove your story at any time by emailing hello@neuromodcommunity.com. We will act on your request promptly, but we cannot recall material that others have already copied or shared elsewhere after it was published.

6. Who We Share Your Data With

We do not share your data except with the service providers we use to run the CIC, who act on our instructions, and where the law requires. Our main providers are:

- **Brevo (email platform):** holds our mailing list and sends our newsletters, confirmation and welcome emails, and surveys.
- **Zeffy (donation platform):** processes donations and holds donors’ payment details and records. Zeffy is a separate organisation and has its own privacy policy.
- **Microsoft (email) and our website hosting provider:** receive and store the messages sent to our contact address, including enquiries and story submissions sent through our website forms.

Some of these providers may process data outside the UK. Where they do, we rely on safeguards required by UK law, such as an adequacy decision or standard contractual clauses. We may also share data if you give us explicit consent, if it is necessary for safeguarding, or if we are legally required to do so.

7. How We Store Your Data

We store data using secure, password-protected systems and restrict access to authorised people only. Enquiries and story submissions sent through our website arrive in our organisation’s email inbox. Mailing list contacts are stored in Brevo, and donor records are held by Zeffy. As we grow, we will introduce more advanced security measures, formal retention schedules and dedicated data management systems.

8. How Long We Keep Your Data

We keep personal data only for as long as necessary:

- **Mailing list:** until you unsubscribe or ask us to delete your details. We then keep a minimal record so we do not email you again.
- **Enquiries and messages:** for as long as needed to deal with them, then deleted when no longer needed.
- **Stories:** for as long as the story is published or you are in contact with us about it. If you decline or withdraw, we delete your submission, photo and details.
- **Donation records:** for the period required for our accounting and legal obligations.
- **Volunteer, advisory and committee records:** for the period of involvement, and as needed for legal or safeguarding requirements.

You may request deletion at any time unless we are legally required to retain certain information.

9. Your Rights Under UK GDPR

You have the right to:

- Access your data and request a copy
- Correct inaccurate data
- Request deletion
- Withdraw consent at any time
- Object to or restrict our processing
- Ask for your data to be provided in a portable format where it applies

To exercise these rights, contact hello@neuromodcommunity.com. You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk or on 0303 123 1113. We would appreciate the chance to put things right first.

10. Children's Data

Our website and services are intended for adults. We do not knowingly collect data from individuals under 18 without parental or guardian consent.

11. Cookies and Third-Party Content

We do not use advertising or analytics cookies on our website. Some pages load content from other services, such as embedded videos, our sign-up form (Brevo), our donation form (Zeffy), and website fonts and scripts. When these load, the provider may receive technical information such as your IP address and set its own cookies. Please see their privacy policies for details.

12. Changes to This Policy

We will update this policy as our organisation and the way we handle data develop, and will change the "last updated" date above. We will clearly communicate any significant changes.

13. Contact Us

For questions or requests related to data protection, please contact:

Neuromodulation Community Interest Company

Email: hello@neuromodcommunity.com

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