

PRIVACY POLICY

Evolve Denim Atelier CIC

Effective Date: 7 June 2026

1. Introduction

Evolve Denim Atelier CIC (“we”, “our”, “us”) is committed to protecting and respecting the privacy of every individual who engages with our organisation. We recognise that personal information is valuable and must be handled responsibly, lawfully, fairly and transparently.

This Privacy Policy explains how Evolve Denim Atelier CIC collects, uses, stores, protects, shares and manages personal information relating to individuals who interact with our organisation, visit our website, participate in our programmes, attend events, volunteer, collaborate with us, make enquiries, subscribe to updates or otherwise engage with our activities.

We are committed to complying with the requirements of:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Human Rights Act 1998
- Applicable safeguarding legislation
- Relevant Information Commissioner’s Office (ICO) guidance

This Privacy Policy applies to all personal information processed by Evolve Denim Atelier CIC regardless of whether the information is collected online, offline, electronically, verbally, in writing or through third-party referrals.

2. About Evolve Denim Atelier CIC

Evolve Denim Atelier CIC is a Community Interest Company focused on advancing circular fashion, textile sustainability, repair, repurposing, skills development, employability, education and social impact initiatives.

Our activities may include:

- Repair and alteration services
- Textile and fashion workshops
- Skills development programmes
- Training and employability initiatives
- Community engagement projects
- Volunteer programmes
- Corporate engagement activities
- Research and consultation projects
- Public awareness campaigns
- Partnership programmes
- Educational events
- Circular economy projects

In delivering these activities we may process personal information relating to a variety of individuals and organisations.

3. Data Controller

For the purposes of UK data protection legislation, Evolve Denim Atelier CIC acts as the Data Controller.

Registered Address

Evolve Denim Atelier CIC
Unit A82 James Carter Road
Mildenhall
IP28 7DE

Email: info@evolve-denim.org

The Data Controller determines how and why personal information is processed and is responsible for ensuring compliance with applicable data protection legislation.

4. Definitions

Personal Data

Personal Data means any information relating to an identified or identifiable individual.

Examples include:

- Names
- Addresses
- Email addresses
- Telephone numbers
- Identification numbers
- Online identifiers
- Attendance records
- Photographs

Special Category Data

Special Category Data refers to sensitive information requiring additional protection under UK GDPR.

Examples include:

- Health information
- Disability information
- Racial or ethnic origin
- Religious beliefs
- Biometric information
- Sexual orientation

Processing

Processing means any operation performed on personal information including:

- Collection
- Recording
- Organisation
- Storage

- Retrieval
- Use
- Disclosure
- Restriction
- Deletion
- Destruction

Data Subject

The individual to whom personal information relates.

Data Controller

The organisation responsible for determining why and how information is processed.

Data Processor

An organisation or individual processing information on behalf of the Data Controller.

5. Data Protection Principles

Evolve Denim Atelier CIC is committed to processing information in accordance with the principles set out in UK GDPR.

Personal information will be:

Processed Lawfully, Fairly and Transparently

Individuals will be informed about how their information is used.

Collected for Specified Purposes

Information will only be collected for legitimate and clearly identified purposes.

Adequate, Relevant and Limited

Only information that is necessary for identified purposes will be collected.

Accurate

Reasonable steps will be taken to ensure information remains accurate and up to date.

Retained Appropriately

Information will not be retained longer than necessary.

Processed Securely

Appropriate technical and organisational measures will be applied.

Accountable

We will maintain governance arrangements demonstrating compliance with applicable legislation.

6. Scope of this Policy

This policy applies to:

Website Visitors

Individuals accessing or using our website.

Workshop Participants

Individuals attending training sessions, workshops and events.

Trainees

Individuals participating in employability, educational or skills programmes.

Volunteers

Individuals supporting organisational activities on a voluntary basis.

Donors

Individuals donating materials, products, equipment, services or financial support.

Partners

Organisations and individuals collaborating with Evolve Denim Atelier CIC.

Suppliers

Individuals and organisations providing goods or services.

Consultants and Contractors

Individuals engaged to support organisational activities.

Job Applicants

Individuals applying for employment opportunities.

Corporate Partners

Businesses supporting or collaborating with Evolve Denim Atelier CIC.

Supporters and Subscribers

Individuals who choose to receive communications, updates or newsletters.

7. Categories of Personal Information

The information we collect depends on the nature of an individual's interaction with the organisation. We may collect:

Identity Information

- Full name
- Preferred name
- Title
- Date of birth where relevant
- Gender where voluntarily provided

Contact Information

- Email address
- Telephone number
- Mobile number
- Postal address
- Emergency contact information

Communication Information

- Emails
- Contact form submissions
- Telephone records
- Meeting notes
- Survey responses
- Complaints
- Feedback
- Testimonials

Programme Information

- Registration information
- Attendance records
- Learning objectives
- Evaluation forms
- Assessment records
- Participation history

Volunteer Information

- Volunteer applications
- Skills information
- Availability details
- References where appropriate
- Training records

Recruitment Information

- CVs
- Cover letters
- Employment history
- Qualifications
- References
- Interview notes

Financial Information

Where necessary:

- Donation records
- Payment information
- Gift Aid information
- Banking information where required

Equality Monitoring Information

Where voluntarily supplied:

- Age
- Ethnicity
- Disability
- Gender
- Caring responsibilities
- Employment status

8. Special Category Data

Certain types of information receive additional protection under UK GDPR.

Evolve Denim Atelier CIC will only collect and process Special Category Data where it is lawful, necessary and proportionate to do so.

Examples may include:

- Health conditions
- Disabilities
- Accessibility requirements
- Dietary requirements
- Equality monitoring information
- Safeguarding information
- Information relating to vulnerable individuals

Special Category Data will only be processed where:

- Explicit consent has been provided where appropriate.
- Processing is necessary for safeguarding purposes.
- Processing is necessary for health and safety purposes.
- Processing is required by law.
- Processing is necessary for substantial public interest reasons.

Additional safeguards will be applied to all Special Category Data.

Access will be restricted to authorised individuals who require access to perform their duties.

9. Information Relating to Children and Young People

Evolve Denim Atelier CIC may engage with children and young people through educational, creative, community and training activities.

Where this occurs:

- Appropriate safeguarding procedures will be followed.
- Parent or guardian consent will be obtained where required.
- Additional security measures will be applied.
- Information will only be collected where necessary.
- Children's information will not be used for inappropriate marketing purposes.

The welfare and protection of children and young people will always take priority.

10. Sources of Personal Information

Personal information may be obtained from several sources.

Information Provided Directly

Most information is provided directly by individuals through:

- Website forms
- Email communications
- Telephone conversations
- Workshop registrations
- Event registrations
- Volunteer applications
- Surveys
- Consultations
- Feedback forms

Information Provided by Third Parties

In some circumstances information may be received from:

- Referral agencies
- Community organisations
- Educational institutions
- Corporate partners
- Funding organisations
- Employment support providers
- Professional advisers

Where information is received from third parties we will take reasonable steps to ensure it has been obtained lawfully.

Publicly Available Information

Information may occasionally be obtained from publicly available sources including:

- Public websites
- Professional networking platforms
- Public directories
- Public social media profiles

Such information will only be used where lawful and appropriate.

11. Website Data Collection

When individuals visit our website, certain information may be collected automatically.

This may include:

- IP address
- Device type
- Browser type
- Operating system
- Pages visited
- Date and time of access
- Time spent on pages
- Referral source
- Website navigation behaviour

This information helps us:

- Improve website performance
- Enhance user experience
- Identify technical issues
- Monitor website security
- Develop future content

Where possible, analytics information will be anonymised or aggregated.

12. Cookies and Similar Technologies

Our website may use cookies and similar technologies. Cookies are small files placed on a user's device to help websites function effectively and improve user experience.

Cookies may be used to:

- Enable website functionality
- Remember user preferences
- Improve performance
- Monitor website usage
- Measure engagement
- Support security measures

Users may manage cookie preferences through browser settings.

Additional information is available within our Cookie Policy.

13. Website Forms

Our website may contain forms allowing visitors to:

- Submit enquiries
- Register interest
- Request information
- Join waiting lists
- Apply for programmes
- Volunteer
- Explore partnerships
- Request workshops
- Contact the organisation

Information submitted may include:

- Name
- Email address
- Telephone number
- Organisation name
- Location
- Message content

Information will only be used for the purpose for which it was provided unless consent has been obtained for additional communication.

14. Mailing Lists and Newsletters

Individuals may choose to subscribe to:

- Newsletters
- Organisational updates
- Programme announcements
- Event information
- Workshop information
- Partnership opportunities
- Community news

Subscription information may include:

- Name
- Email address
- Communication preferences

Individuals may unsubscribe at any time by:

- Clicking an unsubscribe link
- Contacting us directly
- Emailing info@evolve-denim.org

We will process unsubscribe requests promptly.

15. Workshops, Events and Training Programmes

Where individuals register for workshops, events or training programmes we may collect:

- Registration information
- Contact details
- Attendance records
- Accessibility requirements
- Emergency contact information
- Feedback forms
- Evaluation information
- Participation records

Information may be used to:

- Administer participation
- Manage attendance
- Support health and safety
- Evaluate programme effectiveness
- Improve future delivery
- Demonstrate impact to stakeholders

Only information necessary for these purposes will be collected.

16. Volunteer Applications and Volunteer Records

Individuals expressing an interest in volunteering may be asked to provide:

- Personal details
- Contact information
- Skills information
- Experience information
- Availability details
- References where appropriate

Volunteer information may be used to:

- Assess suitability
- Allocate responsibilities
- Deliver training
- Manage safeguarding obligations
- Maintain volunteer records
- Provide support and supervision

Volunteer records will only be retained for legitimate organisational purposes.

17. Recruitment/Employment Applications

Where Evolve Denim Atelier CIC recruits employees, facilitators, consultants, contractors or associates, personal information may be collected throughout the recruitment process.

Information may include:

- Personal details
- Contact information
- Employment history
- Qualifications
- Skills and experience
- References
- Interview records
- Assessment records

Recruitment information will only be used for recruitment, onboarding and employment-related purposes. Unsuccessful applicant information will normally be retained for a limited period unless consent is provided for future opportunities.

18. Photography, Video and Media Content

Evolve Denim Atelier CIC may capture photographs, video recordings and audio recordings during:

- Workshops
- Training sessions
- Community events
- Exhibitions
- Corporate activities
- Partnership projects
- Public events
- Awareness campaigns

Media content may be used to:

- Demonstrate organisational impact
- Promote activities
- Support funding applications
- Produce reports
- Share success stories
- Develop marketing materials
- Publish website content
- Support social media communications

Where appropriate, consent will be obtained before identifiable images or recordings are used.

Individuals may request that identifiable photographs or recordings are not used wherever practical and lawful to do so.

Where activities take place in public settings, group photographs may be used where there is a legitimate organisational interest and where such use would reasonably be expected.

19. Testimonials, Case Studies and Success Stories

Evolve Denim Atelier CIC may invite individuals to contribute to:

- Testimonials
- Case studies
- Impact stories
- Interviews
- Research projects
- Evaluation activities

Participation is entirely voluntary.

Where personal stories are used publicly, appropriate consent procedures will be followed.

Participants may be offered options including:

- Full identification
- First name only
- Anonymous participation
- Use of a pseudonym

Additional protections will be applied where safeguarding concerns exist.

20. Social Media Platforms

Evolve Denim Atelier CIC may maintain accounts on platforms including:

- LinkedIn
- Instagram
- Facebook
- YouTube
- TikTok
- Other platforms as appropriate

When individuals engage with us through social media, information may become visible to us in accordance with platform settings.

Examples include:

- Usernames
- Comments
- Messages
- Shared content
- Reactions
- Public profile information

Social media platforms operate independently of Evolve Denim Atelier CIC and maintain their own privacy practices.

Users should review the privacy policies of the relevant social media platforms before engaging with them.

We are not responsible for the privacy practices of third-party social media providers.

21. Marketing Communications

We may communicate with individuals regarding:

- News and updates
- Workshops
- Training opportunities
- Events
- Campaigns
- Community initiatives
- Volunteer opportunities
- Partnership opportunities
- Organisational developments

Marketing communications may be sent where:

- Consent has been provided.
- A legitimate interest exists.
- Another lawful basis applies.

Individuals may opt out of marketing communications at any time.

We will never sell personal information for marketing purposes.

22. Lawful Bases for Processing Personal Information

Under UK GDPR, organisations must identify lawful bases for processing personal information.

Evolve Denim Atelier CIC relies upon one or more lawful bases depending upon the activity involved.

Consent

Consent may be relied upon where individuals have clearly agreed to specific processing activities.

Examples include:

- Newsletter subscriptions
- Photography permissions
- Testimonials
- Surveys
- Research participation

Individuals may withdraw consent at any time.

Withdrawal of consent will not affect processing that occurred before withdrawal.

Contract

Processing may be necessary to fulfil a contract or take steps before entering into a contract.

Examples include:

- Event registrations
- Training programme participation
- Consultancy agreements
- Service delivery arrangements

Legal Obligation

Processing may be necessary to comply with legal requirements.

Examples include:

- Financial record keeping
- Employment obligations
- Health and safety requirements
- Safeguarding responsibilities
- Regulatory reporting

Legitimate Interests

Processing may be necessary for legitimate organisational interests.

Examples include:

- Managing programmes
- Improving services
- Website administration
- Impact measurement
- Organisational development
- Security monitoring

When relying upon legitimate interests, we will balance organisational needs against individual rights and freedoms.

Vital Interests

Processing may occur where necessary to protect life or prevent serious harm.

This may arise during emergencies or safeguarding situations.

Public Interest

Certain activities may be undertaken in support of community benefit, education, employability and social impact objectives.

Where applicable, processing may be carried out in the public interest.

23. Data Sharing Principles

Evolve Denim Atelier CIC does not sell personal information.

Information will only be shared where:

- There is a lawful basis.
- Sharing is necessary.
- Sharing is proportionate.
- Appropriate safeguards exist.

We seek to ensure that all recipients handle information responsibly and securely.

24. Service Providers and Data Processors

We may use carefully selected third-party providers to support organisational activities.

Examples include:

- Website hosting providers
- Email providers
- Cloud storage providers
- CRM systems
- Survey platforms
- Booking systems
- Event registration systems
- IT support providers
- Security providers
- Payment processors

Where third parties process information on our behalf, appropriate contractual arrangements will be implemented.

These arrangements require providers to:

- Protect information.
- Process information only on our instructions.
- Maintain confidentiality.
- Apply appropriate security measures.
- Comply with applicable legislation.

25. Funders, Commissioners and Corporate Partners

Evolve Denim Atelier CIC may provide reports to:

- Funders
- Commissioners
- Grant providers
- Sponsors
- Corporate partners
- Research partners

Where possible, reporting will use anonymised or aggregated information.

Personal information will only be disclosed where:

- Individuals have consented.
- Disclosure is necessary.
- A lawful basis exists.

We seek to minimise identifiable information whenever possible.

26. Professional Advisers and Legal Disclosures

Information may be shared with:

- Solicitors
- Accountants
- Auditors
- Insurers
- Human Resource advisers
- Regulatory advisers

Information may also be disclosed where required by law, including requests from:

- Courts
- Law enforcement agencies
- Regulatory bodies
- Government departments
- Safeguarding authorities

Any disclosure will be carefully considered and limited to the information necessary for the relevant purpose.

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- Courts
- Law enforcement agencies
- Regulatory bodies
- Government departments
- Safeguarding authorities

Any disclosure will be carefully considered and limited to the information necessary for the relevant purpose.

27. International Transfers of Personal Information

Evolve Denim Atelier CIC seeks, wherever possible, to process and store personal information within the United Kingdom.

However, some third-party service providers may process information outside the United Kingdom.

Examples may include:

- Cloud storage providers
- Email service providers
- Website hosting providers
- Customer relationship management systems
- Survey platforms
- Video conferencing providers

Where personal information is transferred internationally, we will ensure that appropriate safeguards are implemented.

Such safeguards may include:

- UK International Data Transfer Agreements (IDTAs)
- UK Addendum to Standard Contractual Clauses
- Adequacy Regulations
- Contractual protections
- Security assessments

We will take reasonable steps to ensure that transferred information receives an equivalent level of protection.

28. Information Security

Evolve Denim Atelier CIC is committed to maintaining appropriate technical and organisational measures to protect personal information.

Security measures may include:

Access Controls

Access to information is restricted to authorised individuals who require access for legitimate organisational purposes.

Password Protection

Systems are protected through secure authentication measures and password management practices.

Device Security

Reasonable steps are taken to protect computers, mobile devices and storage systems used for organisational activities.

Secure Storage

Information is stored using systems designed to reduce the risk of unauthorised access, alteration, disclosure or loss.

Confidentiality

Individuals with access to personal information are expected to maintain confidentiality and act in accordance with organisational policies and legal obligations.

Third-Party Security

Where third-party providers are used, reasonable efforts are made to ensure appropriate information security standards are maintained.

While every effort is made to protect information, no method of transmission or storage can be guaranteed to be completely secure.

29. Data Retention Principles

Personal information will not be retained indefinitely.

Information will be retained only for as long as necessary to:

- Deliver services
- Fulfil contractual obligations
- Meet legal requirements
- Satisfy financial obligations
- Fulfil safeguarding responsibilities
- Resolve disputes
- Demonstrate organisational impact
- Protect organisational interests

Retention periods may vary depending upon the type of information involved.

30. Indicative Retention Periods

The following periods provide general guidance.

Website Enquiries

Normally retained for up to 24 months following the final communication unless further engagement occurs.

Mailing List Information

Retained until an individual unsubscribes or requests removal.

Workshop Registrations

Normally retained for up to 6 years following programme completion where appropriate.

Training Records

Normally retained for up to 6 years following programme completion.

Volunteer Records

Normally retained for up to 6 years after volunteer involvement ends.

Recruitment Records

Unsuccessful applicant records may normally be retained for up to 12 months.

Financial Records

Normally retained for a minimum of 6 years to comply with legal and accounting requirements.

Safeguarding Records

May be retained for longer periods where required by safeguarding legislation, guidance or risk management considerations.

Incident Reports

Retained in accordance with legal, insurance and operational requirements.

Information may be retained for longer periods where:

- Legal claims are anticipated
- Regulatory requirements apply
- Safeguarding obligations require extended retention
- Public interest considerations exist

31. Secure Disposal of Information

When information is no longer required, it will be securely deleted, destroyed or anonymised.

Methods may include:

- Secure deletion of electronic records
- Permanent removal from storage systems
- Confidential destruction of paper records
- Anonymisation for research and reporting purposes

Reasonable steps will be taken to ensure information cannot be reconstructed after disposal.

32. Personal Data Breaches

Evolve Denim Atelier CIC maintains procedures for responding to personal data breaches.

A personal data breach may include:

- Loss of personal information
- Unauthorised disclosure
- Unauthorised access
- Cyber incidents
- Accidental deletion
- Misdirected communications

Where a breach occurs, we will:

- Investigate promptly
- Assess potential risks
- Take corrective action
- Maintain records
- Notify affected individuals where required
- Notify the Information Commissioner's Office where legally required

Lessons learned from breaches will be used to improve future practices.

33. Individual Rights

Individuals have rights under UK GDPR.

These rights include:

Right to be Informed

Individuals have the right to understand how their information is collected and used.

Right of Access

Individuals may request access to their personal information.

This is commonly known as a Subject Access Request.

Right to Rectification

Individuals may request correction of inaccurate or incomplete information.

Right to Erasure

Individuals may request deletion of personal information in certain circumstances.

Right to Restrict Processing

Individuals may request restrictions on how information is processed.

Right to Data Portability

Individuals may request a copy of information in a portable format where applicable.

Right to Object

Individuals may object to certain processing activities.

Rights Relating to Automated Decision Making

Individuals have rights regarding certain automated decision-making activities.

Evolve Denim Atelier CIC does not generally rely upon automated decision making to make significant decisions about individuals.

34. Subject Access Requests

Individuals may request a copy of information held about them.

Requests should be submitted to:

info@evolve-denim.org

We may require proof of identity before releasing information.

Responses will normally be provided within one month unless an extension is permitted by law.

Requests will be handled in accordance with UK GDPR requirements.

35. Requests for Correction, Restriction or Deletion

Individuals may request:

- Correction of inaccurate information
- Updating of outdated information
- Deletion of information where appropriate
- Restriction of processing
- Objection to processing

Each request will be assessed individually in accordance with applicable legislation and organisational responsibilities.

36. Withdrawal of Consent

Where processing relies upon consent, individuals may withdraw consent at any time.

Withdrawal of consent will not affect processing that occurred before consent was withdrawn.

Requests may be submitted by contacting:

info@evolve-denim.org

37. Complaints About Privacy

Individuals who have concerns regarding the handling of personal information are encouraged to contact Evolve Denim Atelier CIC in the first instance.

Email: info@evolve-denim.org

We will seek to investigate concerns fairly, promptly and transparently.

38. Information Commissioner's Office (ICO)

Individuals have the right to lodge a complaint with the Information Commissioner's Office if they believe their information has been processed unlawfully.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: www.ico.org.uk

Telephone: 0303 123 1113

We encourage individuals to contact us first so that we can attempt to resolve concerns directly wherever possible.

39. Governance and Accountability

Evolve Denim Atelier CIC is committed to maintaining effective governance arrangements relating to privacy and information management.

This includes:

- Policy review
- Risk assessment
- Security monitoring
- Staff and volunteer awareness
- Continuous improvement
- Compliance monitoring

Privacy considerations will be incorporated into organisational decision-making where appropriate.

40. Policy Review and Updates

This Privacy Policy will be reviewed periodically and updated where necessary to reflect:

- Legislative changes
- Regulatory developments
- Organisational growth
- New services
- New technologies
- Changes to operational practices

The most recent version will always be published through appropriate organisational channels.

41. Contact Information

For all privacy-related enquiries, requests or concerns, please contact:

Evolve Denim Atelier CIC

Unit A

82 James Carter Road

Mildenhall

IP28 7DE

Email: info@evolve-denim.org

Document Control

Document Title: Privacy Policy

Organisation: Evolve Denim Atelier CIC

Version: 1.0

Effective Date: 7 June 2026

Review Frequency: Annual or sooner if required by law or operational change

Approved By: Board of Directors, Evolve Denim Atelier CIC