

SAFEBREAKS DEVON CIC

Website Privacy Notice

Policy title	Website Privacy Notice
Applies to	All visitors to and users of safebreaks.co.uk
Data controller	Safebreaks Devon CIC Company No. 12106234
ICO registration	[ICO_NUMBER_TBC]
Policy owner	Data Protection Lead (Managing Director)
Version	3.0
Date	April 2026
Next review date	April 2027
Approved by	Managing Director

Legal and Regulatory Framework

This notice operates within the following legislative and regulatory framework:

UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018: Sets out the lawful bases for processing personal data, the conditions for special category data, and the rights of data subjects.

Privacy and Electronic Communications Regulations 2003 (PECR), as amended: Governs the use of cookies and similar technologies and electronic marketing communications. Applies independently of UK GDPR.

Care Act 2014, section 42: Creates the safeguarding duty under which Safebreaks may be required to share information in connection with concerns about an adult at risk of abuse or neglect.

Children Act 2004, section 11: Creates safeguarding duties in relation to children.

Human Rights Act 1998, Article 8: Right to private life; underpins the right to privacy and confidentiality.

ICO guidance on cookies, direct marketing, and data transfers: The Information Commissioner's Office's published guidance, which the ICO applies when assessing compliance.

1. About This Notice

This notice tells you how Safebreaks Devon CIC collects, uses, and protects your personal information when you use this website.

If you are, or become, a service user with Safebreaks, we share a separate privacy notice that covers the personal information we handle as part of your care. That notice goes further than this one, because we need more information to deliver care well. This website notice only covers what happens on the website.

If you would like this notice in a different format, such as easy read, large print, or translated, please contact us using the details in Section 12.

2. Who We Are

Safebreaks Devon CIC is a community interest company registered in England and Wales. Our company number is 12106234. Our registered office is Riviera House, Salisbury Road, Newton Abbot, Devon, TQ12 2DF.

We are the data controller for the personal information we collect through this website.

We are registered with the Information Commissioner's Office under registration number [ICO_NUMBER_TBC].

Our Data Protection Lead is Luke Williams, Managing Director. You can reach him at info@safebreaks.co.uk.

Safebreaks is not required to appoint a Data Protection Officer under UK GDPR at its current scale of operations. The Data Protection Lead handles all data protection enquiries and requests concerning this website.

3. What Personal Information We Collect

3.1 From Our Contact Form

When you fill in our enquiry form we collect:

- Your name and your relationship to the person needing support.
- Your email address and phone number.
- Your preferred way to be contacted.
- The type of service or service area you are asking about.
- Anything you write in the message field.
- How you heard about us.

3.2 Technical Information From Your Device

When you visit any page on this website, our hosting provider (Vercel) automatically records:

- Your IP address.
- The type of browser and device you are using.
- The pages you view and the time of each request.
- The website that referred you to us, if any.

This information is used to keep the site secure, diagnose technical problems, and understand site performance. It is not linked to your identity unless you also submit the contact form.

3.3 Cookie Information

This website uses strictly necessary cookies only. These are small files the site needs to work and to remember your cookie preference. We do not currently use analytics, advertising, or tracking cookies.

The cookie banner on your first visit confirms your choice, which we store in your browser so the banner does not reappear.

4. Why We Use Your Information and Our Lawful Basis

We use your information only for the purposes below. UK data protection law requires us to identify a lawful basis for each purpose.

Purpose	Lawful basis
To respond to your enquiry (where the enquiry is about a service you or a family member may receive)	Article 6(1)(b) UK GDPR: steps taken at your request before entering into a contract.
To respond to general enquiries that do not lead to a service	Article 6(1)(f) UK GDPR: legitimate interest in responding properly to people who contact us. You can ask for a summary of our legitimate interests assessment at any time.
To keep a short internal record of enquiries	Article 6(1)(f) UK GDPR: legitimate interest in operational oversight, safeguarding review, and continuous improvement.
To meet our safeguarding duties	Article 6(1)(c) UK GDPR: legal obligation under Care Act 2014 s42, Children Act 2004 s11, and related statutory guidance. For special category data: Article 9(2)(h) UK GDPR, provision of health or social care.
To keep the website running securely	Article 6(1)(f) UK GDPR: legitimate interest in operating a safe and functional website.
To store a record of your cookie choice	Article 6(1)(c) UK GDPR: legal obligation under the Privacy and Electronic Communications Regulations (PECR).

5. Providing Your Information Is Voluntary

You are not required by law to give us your information through this website. You can choose not to use the contact form. The only consequence of not providing your information is that we will not be able to reply to you, because we will not know who you are or how to reach you.

6. Special Category Data and Information About Other People

Special category data means information about health, disability, ethnicity, religion, sexual orientation, or similar. We do not ask for special category data on our contact form and we ask you not to include it in your message.

Our work is in care, so enquiries sometimes include information about someone else, for example a family member who needs respite care. If you tell us about someone else's care needs, we treat that information carefully. Our lawful basis for handling any health or care information in an enquiry is Article 9(2)(h) UK GDPR, provision of health or social care. We use it only to decide whether we can help and to give you a useful response.

If you need to share detailed health or care information to get the best response, we will ask you for it through a secure channel once we are in contact with you. Please do not include that detail in the website form.

7. Children's Data

This website is aimed at adults making enquiries about respite and short break services. It is not directed at children. We do not knowingly collect information from children through the website.

If an enquiry is about care for a child, we expect the adult making the enquiry to provide the information on the child's behalf, under their parental responsibility or legal role.

8. Who We Share Your Information With

8.1 Service Providers Who Process Information for Us

We use the following providers to run the website and deliver our emails. They handle your data only under our instructions and under contracts that meet UK GDPR requirements.

Provider	Role	Location
Vercel, Inc.	Hosts this website and automatically logs technical request data	United States
Resend, Inc.	Delivers email notifications from the contact form to our staff	United States
Microsoft Corporation (Microsoft 365)	Hosts the inboxes our staff use to read and reply to your enquiry	United Kingdom (tenant region)
Sanity.io	Runs the content management system behind the website. Sanity does not receive contact form data.	Norway (EEA)

8.2 Other Recipients

We may also share information:

- With the local authority, the police, or other relevant bodies where we have a safeguarding duty to do so, or where we are required to by law.
- With the Care Quality Commission, where we are required to share information as part of regulatory oversight.
- With our professional advisers (solicitors, accountants, insurers) where we need legal, financial, or insurance advice and sharing is strictly necessary.
- With a successor organisation if Safebreaks Devon CIC is ever restructured, merged, or transferred, on equivalent data protection terms.

We do not sell your information. We do not share it with marketing companies. We do not use it for advertising.

9. International Transfers

Some of our service providers are based outside the UK. Where that is the case, we only transfer personal data where there is a lawful mechanism to do so.

Provider	Country	Transfer mechanism
Vercel, Inc.	United States	UK International Data Transfer Addendum to the EU Standard Contractual Clauses
Resend, Inc.	United States	UK International Data Transfer Addendum to the EU Standard Contractual Clauses
Microsoft 365	United Kingdom (our tenant region)	No international transfer; data stays within the UK
Sanity.io	Norway (EEA)	UK adequacy regulations for EEA countries

10. How Long We Keep Your Information

Type of information	How long we keep it	Why
Contact form submissions and related email correspondence	Up to 12 months from the date of enquiry, then deleted	Legitimate interest in following up on enquiries; older enquiries have limited business value.
Service user records (where an enquiry leads to a placement)	Transferred to the Service User record and retained in accordance with the Service User Privacy Notice (typically 8 years from the end of support)	DHSC Records Management Code of Practice 2021.
Technical log data from our hosting provider	Typically up to 30 days, then rotated out	Security and performance monitoring.
Cookie consent records	Stored in your browser until you clear them or change your choice	Evidence of consent under PECR.
Safeguarding disclosures	Retained for longer periods where required by law or regulatory guidance (typically 30 years)	Statutory safeguarding guidance and insurance requirements.

11. How We Keep Your Information Secure

We take appropriate technical and organisational measures to protect your personal information, including:

- Transport Layer Security (TLS) encryption for all website traffic and email in transit.
- Access controls on our email and content systems, so only authorised staff can see enquiries.
- Multi-factor authentication on staff accounts that can see enquiries.
- Reviewed supplier contracts with each of the service providers listed in Section 8.

- Staff awareness of data protection responsibilities, reinforced through induction and annual refresher training.

No system is perfectly secure. If we ever experience a data breach that is likely to affect your rights and freedoms, we will report it to the Information Commissioner's Office within 72 hours and, where required, inform you directly.

12. Automated Decision-Making and Profiling

We do not use automated decision-making or profiling that produces legal or similarly significant effects on you.

13. Marketing

We do not currently send marketing emails or newsletters. If we introduce a newsletter or similar communication in future, we will update this notice and collect your explicit consent before adding you to any marketing list. You will always be able to opt out at any time.

14. Your Rights

Under UK data protection law you have the following rights:

Right	What it means
Access	Ask for a copy of the information we hold about you.
Rectification	Ask us to correct information that is wrong or incomplete.
Erase	Ask us to delete your information, subject to legal exceptions.
Restriction	Ask us to limit how we use your information.
Portability	Ask for a copy of your information in a portable format, where applicable.
Objection	Object to us using your information where our basis is legitimate interest.
Withdraw consent	Withdraw any consent you have given us, where consent is the basis for processing.

To exercise any of these rights, email info@safebreaks.co.uk or write to our registered office. We will respond within one calendar month. There is no charge unless your request is manifestly unfounded or excessive.

15. Contact

Data protection queries: info@safebreaks.co.uk

General enquiries: via our contact form at safebreaks.co.uk

Post: Safebreaks Devon CIC, Riviera House, Salisbury Road, Newton Abbot, Devon, TQ12 2DF

16. Complaints

If you are unhappy with how we have handled your information, we would like to hear from you first so we can try to put it right. Email info@safebreaks.co.uk.

You also have the right to complain directly to the Information Commissioner's Office:

- Website: ico.org.uk
- Phone: 0303 123 1113
- Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

You have the right to contact the ICO at any stage; you do not have to complain to us first.

17. Changes to This Notice

We will update this page if our practices change. The version number and date at the top of this page tell you when it was last updated. If changes are significant, we will also flag them on the website.

18. Related Safebreaks Documents

This notice should be read alongside the following Safebreaks documents where relevant:

- Service User Privacy Notice: explains how we handle personal information of people receiving services from Safebreaks.
- Consent and Information Sharing Policy: sets out how Safebreaks obtains, records, reviews, and acts on consent in relation to information sharing.
- Unregulated Support Service Scope Policy: sets the boundaries of Safebreaks' services as an unregulated community support provider.
- Safeguarding Adults Policy: sets out Safebreaks' safeguarding duties and how they interact with information sharing.

These documents are available on request by contacting the Data Protection Lead at info@safebreaks.co.uk.

Change Log

Version	Date	Author	Summary
1.0	2025	Data Protection Lead	Initial draft.
2.0	April 2026	Data Protection Lead	Full rewrite aligned to UK GDPR Articles 13/14; specific processors named (Vercel, Resend, Microsoft 365, Sanity); 12-month enquiry retention; strictly necessary cookies only; children's data clause added.
3.0	April 2026	Managing Director	House style alignment with wider Safebreaks policy suite: metadata header table, Legal and Regulatory Framework section, structured tables for lawful bases, processors, international transfers, retention, and rights; cross-references to Service User Privacy Notice, Consent and Information Sharing Policy, Unregulated Support Service Scope Policy, and Safeguarding Adults Policy; no changes to substantive data practices or legal positions stated in v2.0.