

# Privacy Policy

**Registered name:** Aco Projects Ltd, trading as Soda

We are the **controller** of your personal data. This means we are responsible for deciding how and why your data is used. For more information on controllers and their responsibilities, please see the ICO's guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information.

## Contact Details

- **Email:** [hello@wearesoda.org](mailto:hello@wearesoda.org)

## What Information We Collect, Use, and Why

### To operate the Soda Community

- Names and contact details
- Addresses (optional)
- Gender
- Pronoun preferences
- Occupation (optional)

### Special category data (optional):

- Racial or ethnic origin
- Health information
- Sexual orientation information

### To provide and improve products and services for clients

- Names and contact details
- Addresses
- Gender
- Pronoun preferences
- Occupation
- Audio recordings (e.g. calls)
- Records of meetings and decisions

### For the operation of client or customer accounts

- Names and contact details

- Addresses
- Purchase or service history
- Account information, including registration details
- Information used for security purposes

### **For information updates or marketing purposes**

- Names and contact details

### **Special category data (optional):**

- Racial or ethnic origin
- Health information
- Sexual orientation information

### **For research or archiving purposes**

- Names and contact details
- Addresses

### **Special category data:**

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information

### **To comply with legal requirements**

- Name
- Contact information
- Client account information
- Any other personal information required to comply with legal obligations
- Safeguarding information

### **For recruitment purposes**

- Contact details (e.g. name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information
- Details of any criminal convictions (e.g. Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

- Security clearance details (e.g. basic checks and higher security clearance)

#### **Special category data:**

- Racial or ethnic origin
- Health information
- Sexual orientation information

#### **For dealing with queries, complaints, or claims**

- Names and contact details

## **Lawful Bases and Data Protection Rights**

Under UK data protection law, we must have a **lawful basis** for collecting and using your personal information. Which lawful basis applies depends on the context (e.g. consent, contract, legal obligation, or legitimate interests).

Your rights under UK GDPR include:

- **Right of access** – request copies of your personal information.
- **Right to rectification** – ask us to correct or complete your personal information.
- **Right to erasure** – ask us to delete your personal information.
- **Right to restrict processing** – ask us to limit how your information is used.
- **Right to object** – object to certain types of processing.
- **Right to data portability** – request a copy of your information in a usable format.
- **Right to withdraw consent** – withdraw your consent at any time (where we rely on consent).

We must respond to data rights requests **within one month**.

To make a request, contact us at: [hello@wearesoda.org](mailto:hello@wearesoda.org).

## **Our Lawful Bases for Processing**

We may rely on:

- **Consent** – where you have given us permission after being provided full information.
- **Contract** – where processing is necessary to perform or prepare a contract.
- **Legal obligation** – where processing is required to comply with the law.
- **Legitimate interests** – where we have a legitimate business reason, provided it does not override your rights.

The specific lawful bases for each type of processing (e.g. client services, recruitment, marketing) are set out in your provided list and will be applied accordingly.

## Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **operate the Soda Community** are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **provide and improve products and services for clients** are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interest – We process your personal information to enhance, modify, and improve our services and communications, providing you with the best experience.

Our lawful bases for collecting or using personal information for the **operation of client or customer accounts** are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Our lawful bases for collecting or using personal information for **information updates or marketing purposes** are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legitimate interest – We have a legitimate interest in marketing our products and services to existing customers, as this allows us to increase sales, improve customer experience, and grow our business, and the impact of this processing is minimal as it is balanced against the customer's reasonable expectation to receive relevant offers and their ability to opt-out at any time.

Our lawful bases for collecting or using personal information for **research or archiving purposes**:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information to **comply with legal requirements**:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract – we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent – we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

## Where We Get Personal Information From

- Directly from you
- Suppliers and service providers

## How Long We Keep Information

In some cases the retention periods are governed by law, in other cases by best practice.

Most information will be kept for **3 - 10 years (usually 6 years)**, but the exact time frame will depend on the nature of the information.

For more details on retention periods, please contact us using the details above.

## Who We Share Information With

- **Community data:** only shared with explicit, written consent for a specific project or opportunity.
- **Client data:** may be shared with professional or legal advisors (e.g. accountants, auditors, solicitors) where necessary.
- **General sharing:** suppliers and service providers who support our operations, or where required by law.

- In some cases, information may be published publicly (e.g. on our website, social media, or other media) **only where you have agreed**.

All third parties are required to handle your information securely and in line with our instructions.

## How We Store and Protect Your Data

- We store personal data securely on protected systems.
- We use appropriate technical and organisational measures to safeguard against unauthorised access, loss, misuse, or disclosure.
- We only keep data for as long as necessary to fulfil the purposes described in this policy, or as required by law or contractual obligations.

## International Transfers

If personal data is transferred outside the UK (for example, through secure third-party service providers such as email or collaboration platforms), we ensure that appropriate safeguards are in place, such as UK-approved Standard Contractual Clauses or equivalent protections.

## How to Complain

If you have any concerns about how we use your personal data, please contact us using the details at the top of this privacy notice.

If you are not satisfied with our response, you can complain to the Information Commissioner's Office (ICO):

**Helpline number:** 0303 123 1113

**Website:** <https://www.ico.org.uk/make-a-complaint>