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Privacy Policy

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Who Are We?

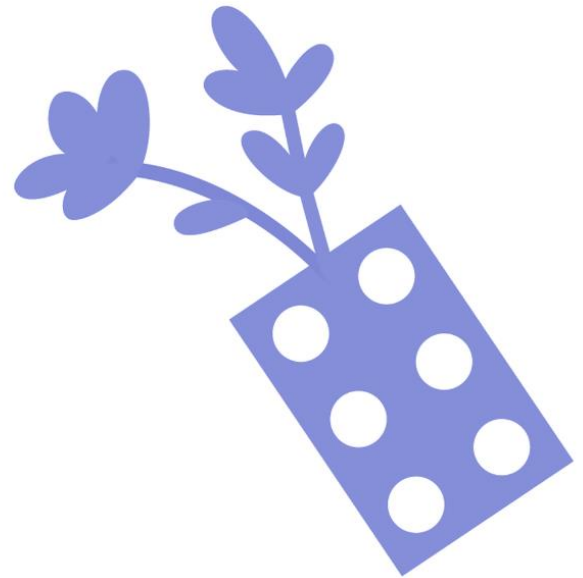
We are Play Included!

Our mission is to make sure every young person has access to positive social experiences and has the chance to make friends through play. So that we can personalise the experiences we build for young people, we need to collect personal data.

We run the Brick-by-Brick® programme, which is Play Included's trademarked name for our LEGO brick based therapy, in partnership with the LEGO Foundation. Brick Club is a name we use for our sessions.

This privacy policy gives you information about how we will collect and use personal data when you interact, facilitate, play, and build with us.

When we refer to "Play Included", "us", or "we" in this notice, we mean Play Included C.I.C. We are a community interest company registered in England under company number 11429775. Our registered address is the Officers' Mess Business Centre Royston Road, Duxford, Cambridge, England, CB22 4QH.



When We Collect Information About You, What We Collect, And Why

We will collect different information from you at different times. What we collect about you and the children or young people who use our service will depend on when you interact with us and the reason we need to collect it. We will only collect and use personal data when we have a lawful reason to.

The main instances we collect data are set out below and include a list of the information we may collect:

- **When you register an account to become a trainer, mentor, facilitator or delegate.**
 - We collect your name, email address and Play Included password.
 - We do this to fulfil our contractual obligations to you.
- **When you enrol and attend or participate in a training course either online or face to face.**
 - We collect your name, contact details, organisation details, country of origin and your role including if you are a parent, carer, family member, professional or organisation. We may also collect information on your dietary and accessibility requirements.
 - We do this to fulfil our contractual obligations to you.
- **When you join our waiting list for a training course.**

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- We collect your name, contact details, organisation details, country of origin and your role including if you are a parent, carer, family member, professional or organisation.
- We do this as it is within our legitimate interest to let you know when the course is available.
- **When you sign up someone to attend a Brick Club**
 - We may, if you choose to provide it, collect the attendee's month and year of birth and the country they live in.
 - We collect this personal data because it is in our legitimate interests to understand more about our Brick Club members to make Brick Club the best experience for everyone.
 - We may, if you choose to provide it, collect information about the attendee's gender identity; setting in which they are attending a Brick Club, such as if they are attending in a healthcare or care setting; and support needs, for example if they have ADHD; autism; a learning, physical or sensory disability; mental health support needs; or speech, language and communication needs.
 - We collect this personal data with your explicit consent, for the purposes of understanding more about our Brick Club members to make Brick Club the best experience for everyone.
- **When you apply for a job with us.**
 - We collect your name, contact details, recruitment information (e.g. right to work documentation and references), qualifications, accreditations, and any additional information we may receive from our recruitment partners.
 - We will use your personal data to assess your suitability for our available roles before taking steps at your request to enter into a contract with you. Where we process your right to work documentation, we will do so to comply with our legal obligations.
- **When you contact us either by phone or email with general queries.**
 - We collect your name, contact details and information relating to your query.
 - We do this as it is in our legitimate interest to make sure we can properly respond to your query.
- **When you attend an event of ours.**
 - We may take photos of you for promotional purposes.
 - If we do this, we will let you know before we take any photos and will display signs in the areas where we are taking photos.
 - We do this as it is in our legitimate interest to market Brick Club to others who may benefit from our services.

When We Share Your Data And Who We Share It With

We may share the information we collect with third parties where we have a lawful reason to do so. Examples of where we might share information include providing it to:

- trainers so that they can provide training and facilitate payment for sessions;
- pilot partners, facilitators, mentors and trainers to effectively manage the Brick-by-Brick programme;

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- event organisers, particularly our local training partners that host our courses;
- our business providers, suppliers and sub-contractors;
- our professional advisors such as our lawyers, auditors or insurers;
- law enforcement, government, or regulatory agencies, and any other third party that we are required to provide information to by law or regulation.

Where We Store Your Data And How It May Be Transferred

If we need to transfer your personal data outside of the UK or EEA, we will make sure any such transfer complies with applicable data protection law.

Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. For further details, please contact us at hello@playincluded.com
- Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK. For further details or to request information about this provision, please contact us at hello@playincluded.com

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

How Long We Keep Your Data

We will not keep your personal data for any longer than is necessary for the purpose for which it was collected or as may be required by law.

In some circumstances your data may be carefully anonymised by us or our third party contractors so that it is no longer associated with you and can no longer be linked to you. This anonymised information may be used by us or our third party contractors indefinitely without notifying you. If we do use this anonymised information, it will be to analyse and improve our services.

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Your Rights

Depending on where you live and the applicable data protection laws, you have various rights including:

- **Access.**
 - You have the right to know what information we hold about you and request copies of it.
- **Complaints.**
 - You have the right to complain about how we process your data.
- **Correction or Rectification.**
 - If any of the information we have about you is incorrect or incomplete, you have the right to ask us to correct it.
- **Erasure or Deletion.**
 - You have the right to request we delete the information we hold about you.
- **Object to Processing.**
 - You have the right to object to the processing of your personal information.
- **Portability or Copies.**
 - You have the right to ask us to transfer your personal information to another organisation or to you in a format that is accessible.
- **Restriction of Processing.**
 - You have the right to restrict how we process your personal information.

Data protection law can be complicated, and these rights may not always be available to you all of the time.

You also have the right to lodge a complaint with us or the ICO, the supervisory authority for data protection issues in the UK. If you are based outside of the UK in the EU, you can find your relevant supervisory authority [here](#).

Before we comply with any request from you, we may ask for information, documents, or other evidence from you to confirm your identity. We do not ask for evidence of your identity to prevent you from exercising your rights, however if you are unable to provide us with the evidence we require we may be unable to comply with your request. We operate on this basis to prevent the fraudulent, malicious, or otherwise adverse disclosure, deletion, or other activity in relation to your data.



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Marketing

We may use personal information such as your name and email address to provide you with our news updates in line with any preferences you have told us about. When we send you our news updates because you have opted-in to receive them. We rely on your consent to contact you.

You can withdraw your consent at any time and unsubscribe from our updates by responding to any email you receive from us to tell us you wish to unsubscribe or by contacting us at hello@playincluded.com.

We may also use pictures or videos provided by you or taken by you where you consent to these being used by us for marketing purposes.

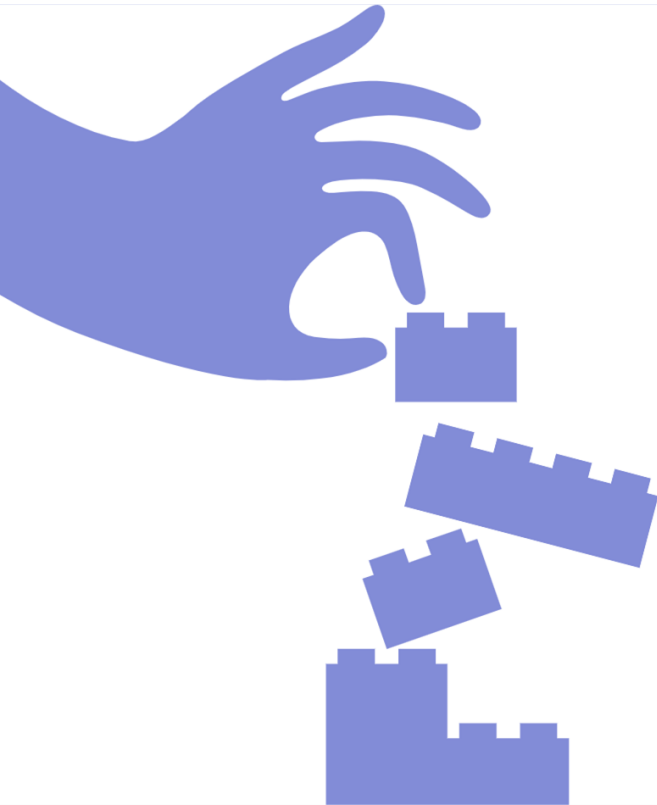


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Accessible Privacy Policy



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WHO ARE PLAY INCLUDED?

We are the company that runs the Brick-by-Brick® programme, which you might know as Brick Club! We want to make sure every person has the chance to make friends through play!

WHAT IS THIS AND WHY DO I NEED TO READ IT?

This document is called a "Privacy Policy". It explains how we use something called personal data so that we can run Brick Club and the Brick-by-Brick® programme.

This privacy policy is aimed to give you information about how we will collect and use personal data when you interact, play and build with us.

You might want to read through this with someone who looks after you.

If you have any questions about this document, please ask your Brick Club Facilitator.

WHAT IS PERSONAL DATA?

Personal data is information about you. The information can be anything from your name to when your birthday is. It can also include other things about you like where you live or if you wear glasses.

If you think of yourself like a LEGO model of a building or vehicle or something out of your imagination, each brick you are made of is a different piece of personal data. You might be made of different coloured LEGO bricks or different shaped bricks and each one would tell another LEGO builder something different about you!

WHAT DO YOU COLLECT ABOUT ME AND WHY?

Play Included will collect information about you so that we can run Brick Club. When we "collect" your information we make our own copy or record of it, but the information is still yours. It is kind of like how when you have built a LEGO model, if we build the same one or draw a picture of yours, you still have the original model but now we have one too!

The information we collect will depend on the reason we need it. So you can sign up to Brick Club, set up an account and attend our sessions, we will collect things like your name, email address and a password.

Play Included may also collect information about you so that we can make changes to Brick Club to make it the best experience possible for everyone. The person who looks after you will decide if they would like to share information about your gender identity and support needs with us. You can let them or us know if you would not like us to have this information.

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Because your information is important, we will not collect it unless we are allowed to. There are some really important rules called laws which we have to follow. These laws protect your personal data and make sure we only collect and use your information when we are allowed to.

WHAT DO YOU DO WITH THE INFORMATION YOU COLLECT ABOUT ME?

We will use your information so that we can run Brick Club. There are some things that we need to know about you so we can prepare the Club and make sure you have fun!

Sometimes we may need to share the information we collect about you with other people. For example, we might need to tell someone your name if they are helping us with the Brick Club. Sometimes we need to tell important people like lawyers, finance people and the government about the information we have about you so that they can check we are following the rules. We will only share your information when we really need to.

Sometimes we might need to send your information to another country that is not in the UK or Europe. If we do, we will make sure we follow the special rules called laws that protect your information and make sure that we do what we can so your information will be as safe as it is in the UK.

If you want to know more about sending your information to another country, let us know by emailing us (or asking one of your trusted adults to email us for you). Our email address is: hello@playincluded.com

So that we can keep your information safe, we won't keep it longer than we need to.



WHAT CAN I DO ABOUT MY INFORMATION?

The really important rules about your information called data protection laws give you (and the adults who look after you) the right to do some things with the information we have about you. Rights are a sort of special permission that you have.

The rights you can use are:

- **Access.**

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- You have the right to know what information we hold about you and request copies of it.
- **Complaints.**
 - You have the right to complain about how we process your data.
- **Correction or Rectification.**
 - If any of the information we have about you is incorrect or incomplete, you have the right to ask us to correct it.
- **Erasement or Deletion.**
 - You have the right to request we delete the information we hold about you.
- **Object to Processing.**
 - You have the right to object to the processing of your personal information.
- **Portability or Copies.**
 - You have the right to ask us to transfer your personal information to another organisation or to you in a format that is accessible.
- **Restriction of Processing.**
 - You have the right to restrict how we process your personal information.

The rules that give you these rights can be complicated. So sometimes you might not always be able to use them.

You also have the right to lodge a complaint with us or the ICO, who are the important people in the UK who make sure we follow the data protection laws. If you are based outside of the UK, you can find your important people [here](#).

If you want to use one of your rights, please email us at hello@playincluded.com

Before we reply to your email, we might ask for proof you are who you say you are. We only ask for this proof so that we make sure that we are protecting your information and we are not giving it to anyone who is pretending to be you!

WHAT DO I DO IF I HAVE SOME QUESTIONS?

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If you have any questions about this document, please ask your Brick Club Facilitator and they can help!

