FELIX'S FLAME

Data Protection & Privacy Policy

Felix's Flame CIC • Company number 17475609

Approval status: Approved by both directors on 5 November 2026. The approval record reflects the directors' confirmation and the review actions recorded in this document.

Approved version 1.0 – 5 November 2026

Document status and use

This updated pack incorporates decisions confirmed during review, including the agreed retention periods, the proposed lawful bases, the optional Comfort Box information approach and current volunteer access arrangements.

It reflects the systems and practices described by the CIC at the time of drafting. It is not yet marked approved. The directors should review and approve the internal policy and procedures, and the CIC should complete the verification actions at the end before publishing the Privacy Notice.

This pack brings together the procedures, confirmed operating practices and proposed lawful bases. The directors must formally approve the lawful basis register, legitimate interests assessments and retention schedule. Where optional baby/loss details or family stories reveal special-category personal data about an identifiable living person, an Article 9 condition must be identified and recorded before that processing takes place. This document is a final draft for director approval, not an approved policy.

Part 1 – Internal Data Protection Policy

1. Purpose and commitment

Felix's Flame CIC respects the privacy of families, supporters, customers, volunteers and others who come into contact with its work. The CIC recognises that information shared about pregnancy, birth, baby loss, bereavement and health can be particularly personal.

The CIC will collect only information it has a genuine reason to use, explain how information is handled, restrict access appropriately and take reasonable steps to protect it against loss, misuse, unauthorised access or disclosure.

2. Scope

This policy applies to directors, volunteers, contractors and anyone handling personal information on behalf of Felix's Flame CIC. It covers information received through Comfort Box requests, feedback forms, the website and shop, payments, newsletters, social media, the private Facebook group, surveys, correspondence, fundraising and volunteer administration.

3. Information handled

- Contact details, including names, email addresses, telephone numbers and postal addresses.
- Comfort Box request and delivery information, including optional details about a baby's name or type of loss.
- Messages, enquiries, correspondence and support-group interactions.
- Anonymous feedback and survey responses.
- Shop orders, donation and transaction records.
- Newsletter subscriber details and marketing preferences.
- Volunteer applications, contact details and role-related records.

Information about health, pregnancy, birth or bereavement may constitute special category personal data. The CIC must identify both an Article 6 lawful basis and an Article 9 condition before processing such information.

4. How information may be used

- Responding to enquiries and managing Comfort Box requests and deliveries.
- Processing shop orders, payments and related financial records.
- Communicating with people who have chosen to receive newsletters.
- Gathering feedback and understanding experiences to improve the CIC's work.
- Managing volunteers, partnerships, fundraising and organisational administration.
- Meeting legal, accounting, safeguarding and regulatory responsibilities.

5. Data minimisation and optional details

The CIC will not deliberately collect more information than is necessary for the relevant purpose. On the Comfort Box form, details such as the baby's name and type of loss are optional. A family can request a Comfort Box without providing these details. Optional information must not be treated as a condition of receiving a pack.

6. Access and security

Access to personal information must be limited to people who need it for an authorised purpose. Volunteers must not download, retain, copy or share family information for their own purposes.

- The Felix's Flame Google Workspace account has two-step verification enabled.
- The Comfort Box response spreadsheet is set to Restricted access and currently only Beth has access.
- The Wix dashboard has two-step verification enabled and currently only Beth has access.
- The CIC has confirmed that its Wix cookie banner offers visitors the option to accept, reject or manage non-essential cookies, and that selecting Reject prevents non-essential cookies from being set. This was confirmed by the CIC during its review on 5 November 2026.
- Access permissions must be reviewed before any additional person is given access. At present, Beth alone has access to the Comfort Box spreadsheet and Wix dashboard. a volunteer moderator has moderator access to the private Facebook support group; a volunteer has no access to CIC accounts or family records.

7. Current systems and providers

- Google Forms and a linked Google Sheet, held in the Felix's Flame Google account, are used for Comfort Box requests. Only Beth currently has access to the linked sheet.
- Google Forms is also used for the feedback form. Email collection is switched off and the feedback form is intended to be anonymous.
- Wix is used for the website, online shop and Wix Email Marketing.
- Wix Payments is used to process shop payments.
- Facebook and Instagram are used for social media. Facebook is also used for the private support group.

The CIC has confirmed that Google Workspace data processing terms, the Wix Data Processing Agreement, Zeffy data protection terms and Meta business data processing terms have been reviewed and accepted. The CIC should retain records of the applicable terms and continue to verify provider settings, subprocessors and international transfer information.

8. Sharing information

Personal information must not be shared casually. It may be shared where necessary for an authorised purpose, such as sending a parcel, processing a payment, operating the website, meeting a legal obligation or protecting someone from harm. Information must not be given to a sponsor or business for its own marketing merely because it supports Felix's Flame.

9. Stories, photographs and lived experience

Providing information for a Comfort Box request, feedback form or private conversation does not automatically give the CIC permission to publish a person's story, photograph, quotation or personal account. Separate appropriate permission must be obtained before identifiable material is used publicly. Feedback and survey information should be anonymised where appropriate.

10. Confidentiality and online community
People representing the CIC must handle information sensitively and maintain appropriate boundaries. Current volunteers have signed confidentiality commitments through the volunteer sign-up form. Some volunteers contribute blog articles and approach businesses independently, without access to CIC accounts or family records. Authorised volunteer moderators may see members' personal and sensitive information as part of that role. She must use that access only for moderation and follow the CIC's confidentiality and safeguarding procedures.

11. Individual rights
People may have rights to access, correct, erase, restrict or object to certain uses of their personal information, and to withdraw consent where consent is the basis relied upon. Requests should be sent to felixsflame@gmail.com and handled within applicable legal time limits.

12. Responsibilities
The directors are responsible for ensuring that the CIC handles personal information appropriately. Beth is currently the day-to-day contact for data protection matters. If a concern involves Beth, it should be raised with Tom as the other director. If neither director can deal with a matter independently, appropriate external advice should be sought.

13. Review
This policy should be reviewed at least annually and sooner if the CIC's activities, systems, legal responsibilities or risks change.

Part 2 – Personal Data Breach Procedure

1. What is a breach?
A personal data breach may include information being lost, accessed without permission, shared with the wrong person, disclosed accidentally, or otherwise compromised. Examples include sending a family address to the wrong recipient, unauthorised access to a Google or Wix account, losing a device containing personal information, or sharing a private story without permission.

2. Reporting route
Anyone working or volunteering with Felix's Flame must report a suspected breach promptly. Beth is the first point of contact. If the concern involves Beth, it must be raised with Tom. If it involves Tom, it should be raised with Beth. If neither director can deal with it independently, appropriate external advice should be sought. Anyone may contact emergency services where there is an immediate risk of serious harm.

3. Immediate steps
- Establish what happened and when it was discovered.
- Take reasonable steps to stop further access or sharing.
- Secure affected accounts, files or devices and contact the relevant provider if needed.
- Identify the information and people potentially affected.
- Preserve relevant evidence; do not delete records needed to understand the incident.
- Record actions and decisions.

4. Assessing and notifying
The director handling the incident must assess the nature and volume of information involved, whether it includes sensitive information, who may have accessed it and the possible consequences for affected people.

Where a breach is likely to result in a risk to people's rights and freedoms, the ICO must be notified without undue delay and, where feasible, within 72 hours of the CIC becoming aware. Where a breach is likely to result in a high risk to individuals, those affected must also be informed without undue delay. If notification is not required, the reasoning must still be recorded.

5. Breach register

All suspected personal data breaches must be recorded, including incidents that are not reported to the ICO. The record should include the date discovered, what happened, information involved, people potentially affected, containment steps, risk assessment, notification decisions and any action to prevent recurrence.

6. Learning

After an incident, the directors should consider whether account access, storage, sharing practices, volunteer guidance or policies need to change.

Part 3 – Proposed Data Retention Schedule

The periods below are proposed internal retention periods for director review. They are not universal statutory deadlines. The CIC should document why each period is appropriate, consider any legal or accounting requirements and securely delete or anonymise information when it is no longer needed.

Information	Proposed period	Notes
Completed Comfort Box requests and delivery details	12 months after delivery	Delete earlier if no longer needed; retain longer only for a documented reason.
Unfulfilled or cancelled requests	12 months after closure	Review if there is an unresolved enquiry or complaint.
Optional baby and loss details	Up to 12 months after delivery	Keep only while needed for the request or another documented purpose.
General enquiries	12 months after last contact	Unless an ongoing matter requires longer.
Anonymous feedback	Indefinitely, while genuinely anonymous	For ongoing learning and service improvement. Remove identifying details from free text where possible.
Volunteer records	During volunteering plus 12 months	Check whether particular records need a different period.
Financial and accounting records	At least 6 years, subject to applicable requirements	Keep separately from delivery details where possible.
Story and photograph permissions	While material remains in use	Keep evidence of permission; review promptly if permission is withdrawn.

Part 4 – Proposed Lawful Basis Register

This is a working register, not a final legal determination. For each processing purpose, the CIC must record the Article 6 lawful basis that genuinely applies. Where special category information is processed, an additional Article 9 condition must also be identified and documented.

Activity	Article 6 basis to assess	Article 9 condition	Action
Comfort Box contact and delivery details	Legitimate interests (proposed)	Not usually applicable to ordinary delivery details	Complete and retain a three-part legitimate interests assessment before relying on this basis.
Optional baby and loss details	Consent (proposed)	Explicit consent where the information is special category personal data	Use the separate, unticked wording in Part 13. Confirm whether answers reveal special category data about an identifiable living person

			and document the Article 9 condition. Record consent and withdrawals.
Anonymous feedback	Not applicable if genuinely anonymous; otherwise assess an appropriate Article 6 basis	Not applicable if genuinely anonymous; assess if free text identifies someone or reveals health information	Email collection is off. Retain only genuinely anonymous feedback indefinitely; remove identifying details where possible.
Shop orders	Contract (Article 6(1)(b))	Not usually applicable to ordinary order details	Use for information necessary to process and fulfil purchases; separate from marketing.
Payment and accounting records	Contract for transaction processing; legal obligation for records required by law	Not usually applicable	Distinguish transaction processing from statutory record retention.
Volunteer administration	Legitimate interests (proposed)	Assess separately if sensitive information is collected	Complete a three-part assessment; limit records to what is needed.
Newsletter marketing	Consent (proposed)	Not usually applicable	Marketing paused. Add separate unticked opt-in; do not treat order email addresses as subscriptions.
Publication of identifiable stories or photographs	Consent or another appropriate basis depending on circumstances	Explicit consent may be needed where special category data is revealed	Obtain separate, specific permission; explain platforms and use; document withdrawal. Assess Article 9 condition if special category data is revealed.
Safeguarding disclosures	Depends on the circumstances and purpose	An appropriate Article 9 condition may be needed	Assess case by case and record the appropriate Article 6 basis and, where needed, Article 9 condition.

Part 5 – Public Privacy Notice

Felix's Flame CIC | Company number 17475609

Last updated: November 2026

Felix's Flame CIC respects your privacy. We understand that information people share with us can be deeply personal, particularly when it relates to pregnancy, baby loss, bereavement and health. This notice explains what information we collect, why we use it and the choices and rights you have.

Who we are

Felix's Flame CIC is a Community Interest Company supporting families affected by pregnancy and baby loss across the United Kingdom. For data protection purposes, Felix's Flame CIC is responsible for deciding how and why your personal information is used.

Contact: felixsflame@gmail.com | https://felixsflame.com

What information we collect

Depending on how you interact with us, we may collect your name and contact details, postal address, Comfort Box request information, details you choose to share about your baby or experience of loss, messages and enquiries, feedback, shop order and transaction information, newsletter preferences and volunteer information. Some information about health, pregnancy, birth or bereavement may be special category personal data.

Comfort Box requests

Comfort Box requests are submitted through Google Forms. Responses are transferred to a linked Google Sheet held within the Felix's Flame Google Workspace account. Access to the linked spreadsheet is currently restricted to Beth, the director managing Comfort Box requests.

The form may ask whether you wish to share your baby's name or type of loss. These details are entirely optional. You do not have to provide them to request or receive a Comfort Box.

Feedback

Our feedback form uses Google Forms. Email collection is switched off and the form is intended to be anonymous. Feedback is used to understand experiences and improve our work. We may retain genuinely anonymous feedback for ongoing learning and service improvement. Please avoid including identifying details in free-text answers; if identifying details are included, we will remove them where possible.

Why we use information

We may use information to respond to enquiries, manage Comfort Box requests and deliveries, process shop orders and payments, communicate with people who have chosen to receive newsletters, gather feedback, improve our resources, manage volunteers and meet legal or financial responsibilities. We do not sell personal information or give it to businesses for their own marketing.

Sensitive information

We treat information about pregnancy, birth, health and baby loss with particular care. We limit access and collect it only where there is an appropriate reason. Where we process special category information, we identify an appropriate lawful basis and additional condition under data protection law.

Stories, photographs and lived experience

Sharing an experience with us does not automatically give Felix's Flame permission to publish it. Before using an identifiable story, photograph, quotation or personal account publicly, we will explain how it will be used and obtain appropriate permission separately. We use anonymised information wherever possible.

Who we share information with

Where necessary, information may be shared with delivery providers, Google, Wix and relevant service providers, payment providers, or authorities where we have a legal obligation or an appropriate reason to protect someone from harm. We do not give a family's personal story or contact details to a sponsor simply because they support our work.

Website, shop, payments and newsletters

Our website and online shop are operated through Wix. Shop payments are processed through Wix Payments and relevant payment processing partners. Wix Email Marketing is used for newsletters and updates to people who have chosen to receive them. Newsletter marketing is currently paused while we review sign-up and consent arrangements. You can unsubscribe from marketing emails using the link provided in an email.

Social media and private group

We use Facebook and Instagram to communicate and share information. Our private Facebook support group has written rules asking members not to screenshot, copy or share other members' posts outside the group. Authorised volunteer moderators, who are bound by confidentiality commitments, may see members' posts to carry out moderation. Facebook is an independent platform and we cannot guarantee that other members will keep group content private. Please think carefully before sharing information you would not want copied or shared elsewhere.

Security and retention
We take reasonable steps to protect information from loss, misuse, accidental disclosure and unauthorised access. Access is limited to people who need it for an authorised purpose. We keep information only for as long as we have a genuine operational, legal, financial or accountability reason to do so, after which it will be securely deleted or anonymised.

Your rights and complaints
Depending on the circumstances, you may have the right to access, correct or request deletion of your information, restrict or object to certain processing, and withdraw consent where we rely on it. Contact felixsflame@gmail.com to exercise your rights or raise a concern. You can also complain to the Information Commissioner's Office at https://ico.org.uk or by telephone on 0303 123 1113.

Changes to this notice
We may update this notice as Felix's Flame develops or our data protection responsibilities change. The latest version will be made available on our website.

Part 6 – Google Forms privacy wording

Comfort Box request form
Your information is collected by Felix's Flame CIC so we can manage your Comfort Box request and arrange delivery. Your responses are stored in a linked Google Sheet managed through the Felix's Flame Google account. Access is currently restricted to the director managing requests.

Questions about your baby's name and type of loss are optional. You can leave these blank and still request a Comfort Box. We will not publish your personal details or share your story without appropriate permission.

Read our full Privacy Notice: [insert link to the Wix Privacy Notice page].

Questions about your information? Email felixsflame@gmail.com.

Feedback form
Your feedback is collected to help Felix's Flame CIC understand how its Comfort Boxes and support are experienced and how our work can improve. Email collection is switched off and the form is intended to be anonymous. Please avoid including names or other details that could identify you or another person. Read our Privacy Notice: [insert link].

Part 7 – Actions before approval and publication
- Confirm and document the Article 6 lawful basis and, where relevant, Article 9 condition for each processing activity. Do not rely on the proposed register without this review.
- Review the exact Comfort Box form wording. If relying on explicit consent for optional special category information, add a separate, unticked statement that clearly identifies the information and purpose, and explain how consent can be withdrawn.
- Check Google and Wix data processing terms, account settings, subprocessors and international transfer information.
- Confirm Wix cookie settings and that non-essential cookies are not placed before consent where consent is required.
- Keep newsletter marketing paused until the sign-up process and existing subscriber permissions have been reviewed. Add a clear affirmative opt-in and unsubscribe process before resuming.
- Adopt the retention schedule formally and set up a simple periodic review and deletion process.
- Add the Privacy Notice page to the Wix website, link it in the website footer and place the link in the Google Forms.
- Record the date the directors approve the internal policy and procedures. Keep the public Privacy Notice's last-updated date accurate.

Part 8 – Decisions confirmed during review

- Comfort Box requests: ordinary name, contact and delivery details are proposed to be processed on the basis of legitimate interests. A written three-part legitimate interests assessment must be completed before relying on this basis.
- Optional baby/loss details: questions about the baby's name and type of loss remain optional. The proposed approach is a separate, unticked explicit consent statement. Families can request a Comfort Box without answering these questions. This information is not to be used for publicity or fundraising under this consent.
- Shop orders: contract is the proposed Article 6 basis for information necessary to process and fulfil purchases.
- Payment and accounting: contract applies where necessary to process the transaction; legal obligation applies to records that must be retained by law.
- Volunteer administration: legitimate interests is the proposed basis for basic volunteer records, subject to a written assessment.
- Newsletter marketing: consent is the proposed basis. Marketing remains paused. Email addresses collected for orders are not automatically newsletter subscriptions.
- Feedback: the form does not collect email addresses and is intended to be anonymous. Genuinely anonymous feedback may be retained indefinitely for learning and improvement. Identifying details in free text should be removed where possible.
- Retention: completed Comfort Box requests – 12 months after delivery; unfulfilled/cancelled requests – 12 months after closure; general enquiries – 12 months after last contact; volunteer records – while volunteering plus 12 months; financial/accounting records – at least six years subject to applicable requirements; story/photo permission records – while material remains in use.
- Access: Beth alone currently accesses the Comfort Box spreadsheet and Wix dashboard. a volunteer moderator has moderator access to the private Facebook support group. a volunteer has no access to CIC accounts or family records. Both volunteers signed confidentiality commitments through the volunteer sign-up form.
- Private group: written group rules ask members not to screenshot, copy or share posts outside the group. Felix’s Flame cannot guarantee that members will comply.

Part 9 – Outstanding checks before approval

- Directors to review and formally approve the completed legitimate interests assessments in Part 10.
- Record the approval date and review date for each assessment in Part 10.
- Confirm the Article 6 basis and Article 9 condition for optional baby/loss information. Check the final explicit consent wording and how a person can withdraw consent.
- Review the Comfort Box form to ensure the existing request confirmation and new optional consent are separate and clear.
- Keep newsletter marketing paused until a separate, unticked opt-in is implemented and existing Wix contacts are reviewed. Order-related emails may continue where needed for the order.
- Retain evidence of the accepted Google Workspace, Wix, Zeffy and Meta data protection terms, and check current subprocessors and international transfer information.
- Test the Wix cookie banner after selecting Reject: confirm that analytics, advertising and other non-essential cookies or similar technologies are not set before consent. Record the result and correct the settings if needed.
- Confirm the proposed retention periods are reflected in a practical review and secure deletion process.
- Ensure a volunteer moderator's moderator role is covered by the signed volunteer confidentiality commitment and that she knows the group's moderation and safeguarding procedures.
- Add the final Privacy Notice link to the website and Google Forms after the notice has been checked and approved.
- Record a formal board decision approving the internal policy pack and the date of approval. Only then change the document status to Approved.

Formal approval record – to complete

Approval status	**Not yet approved**
Board approval date	To be completed after all outstanding checks
Approved by	Beth Cooper, Director; Tom, Director – record formal decision
Next review date	12 months after approval, or sooner if systems or processing change

Part 10 – Legitimate Interests Assessments

The following assessments record the purposes, necessity and balancing considerations discussed by the directors. They are working assessments for director review and formal recording. They should be checked against actual practice and approved before Felix's Flame CIC relies on legitimate interests for these activities.

10.1 Comfort Box requests and delivery

Purpose

Felix's Flame CIC has a legitimate interest in managing Comfort Box requests and arranging delivery to people who have requested a box.

Information and necessity

The CIC uses the person's name to identify the request, contact details to communicate about the request and any delivery issues, and postal address to send the Comfort Box. These details are needed to manage and fulfil the request.

Balancing test and reasonable expectations

A person who submits a Comfort Box request would reasonably expect their name, contact details and postal address to be used to manage that request and arrange delivery. The CIC does not use these contact details for unrelated fundraising, newsletters or general marketing.

Safeguards

- Access to the linked Comfort Box spreadsheet is restricted to Beth.
- The Google Sheet is set to Restricted access and is not shared publicly.
- Two-step verification is enabled on the Google account.
- Contact details are used only for the request, delivery and necessary follow-up.
- Completed requests are retained for 12 months after delivery, then securely deleted unless a documented reason requires longer retention.

Outcome: The information provided supports legitimate interests as a proposed Article 6 basis for ordinary Comfort Box request and delivery details. This assessment does not cover optional baby/loss details, which are addressed separately in the lawful basis register and require a separately documented Article 9 condition where special category data is processed.

10.2 Volunteer administration

Purpose

Felix's Flame CIC has a legitimate interest in communicating with volunteers, organising tasks and activities, and managing each person's involvement.

Information and necessity

The CIC currently collects basic volunteer information: names, email addresses and contact details. These details are needed to communicate with volunteers and coordinate their involvement. The CIC does not currently collect emergency contacts, references, dates of birth or health information for volunteer administration.

Balancing test and reasonable expectations

Volunteers would reasonably expect their basic contact details to be used to communicate with them about their volunteering and organise their tasks. The information is not used for unrelated marketing or other purposes.

Safeguards

- Access to volunteer contact details is limited to the two directors, Beth and Tom.
- Only basic contact information is currently collected.
- Volunteer records are retained while the person is volunteering and for 12 months after they leave, unless a documented reason requires longer retention.

Outcome: The information provided supports legitimate interests as a proposed Article 6 basis for basic volunteer administration. The directors should record their final decision and review this assessment if the information collected, access arrangements or purposes change.

10.3 Review and approval record

These assessments should be reviewed if Felix's Flame changes the information it collects, the purposes for using it, who can access it, or the retention periods. The directors should record the date on which each assessment is approved.

Assessment	Director approval date	Review date
Comfort Box requests and delivery	To be completed	12 months after approval, or earlier if circumstances change
Volunteer administration	To be completed	12 months after approval, or earlier if circumstances change

Part 11 – Systems and information flows confirmed during review

This section records the systems and access arrangements described by the directors during the policy review. It should be checked whenever the CIC changes a platform, account, access permission or the type of information held.

System	Information and use	Access and security confirmed
Google Workspace and Drive	Comfort Box request forms and linked spreadsheet; CIC administration; expenses and receipts; business records; blog submissions, photographs and related permission records.	Free Workspace account using default data region settings. Beth is the sole account administrator. Two-step verification is enabled. Comfort Box spreadsheet access is restricted to Beth. General Drive access and the Blog Posts folder are limited to the directors. Drive folders and documents are not shared externally.
Wix	Website, online shop, customer details, order history and shop payment processing through Wix Payments. Customer order records remain in Wix and are not routinely downloaded elsewhere.	Paid subscription. Two-step verification enabled. Dashboard access limited to directors. Wix Data Processing Agreement reviewed and accepted, as confirmed by the CIC. Cookie banner allows visitors to accept, reject or manage non-essential cookies.
Zeffy	Donation processing and donor records. Donor records are available within the Zeffy account and remain there; they are not routinely downloaded or stored separately. Zeffy is not currently used to send fundraising emails.	Separate account with access restricted to directors. Two-step verification enabled. Zeffy data protection terms reviewed and accepted, as confirmed by the CIC.
Meta – Facebook and Instagram	Social media pages, comments, messages and communications. Direct messages remain within the platform inboxes; they are not copied into Google Drive and screenshots are not routinely taken for record keeping.	One Meta account manages both pages. Two-factor authentication enabled. Account access restricted to directors. Volunteers do not have access to the social media account itself.
Private Facebook support group	Members may share personal and sensitive information in posts and discussions. A volunteer moderator may view content as part of moderation.	Written group rules ask members not to screenshot, copy or share other members' posts outside the group. Volunteer moderators are bound by confidentiality commitments. Felix's Flame cannot guarantee that members will follow group rules.
Email	Used for communications with families, volunteers, donors and businesses.	No WhatsApp is used for CIC communications. Email and social media are the communication channels currently used.

11.1 Provider terms and international processing

The CIC has confirmed that Google Workspace data processing terms, the Wix Data Processing Agreement, Zeffy data protection terms and Meta business data processing terms have been reviewed and accepted. This

pack records that confirmation but does not independently verify the agreements, their current versions or the settings in each account.

The CIC has also confirmed that Meta business data processing terms have been reviewed and accepted. The email address felixsflame@gmail.com is hosted through the same Google Workspace account used for Drive and Forms. Meta's public terms vary by product and role; the exact terms applicable to the CIC's Facebook Page, Instagram account, inboxes and private group have not been independently identified from the account. The directors should retain the accepted terms from the relevant Meta account and check the applicable transfer and subprocessor information before final approval.

Google Workspace is using its default data region settings. The CIC must not describe information as being stored exclusively in the UK. Google publishes a current Workspace subprocessor list identifying service functions and processing countries; the list includes Google group entities and third-party support providers in multiple countries. Google states that its Cloud Data Processing Addendum covers its processor obligations. The CIC has confirmed that its data processing terms were previously accepted, but should retain evidence of the applicable account terms and review the current list periodically.

11.2 Social media messages

Facebook and Instagram direct messages are currently kept within the relevant platform inbox. The CIC does not routinely take screenshots or copy message content into Google Drive. Where a message raises a safeguarding concern, complaint or other matter that needs a formal record, the directors should assess what information needs to be recorded securely and retain only what is necessary.

11.3 Newsletter and customer email separation

Email addresses collected through Wix checkout are used for order-related communications. They are not automatically treated as newsletter subscriptions. Newsletter marketing remains paused until a separate, clear opt-in process is implemented and existing contacts are reviewed.

Part 12 – Updated outstanding actions before approval

- Complete and formally approve the two legitimate interests assessments in Part 10.
- Before collecting or using optional baby/loss details, confirm whether the answers reveal special-category personal data about an identifiable living person. Record the Article 6 basis and, where required, Article 9 condition. The current separate, unticked consent approach is designed to obtain consent for the stated purpose, but the legal classification and final wording must be approved.
- Check that the live Comfort Box form matches Part 14: baby's name and type of loss only; separate optional, unticked consent; families can request a box without consenting; add the Privacy Notice link after publication.
- Keep newsletter marketing paused until a separate, unticked opt-in is implemented and existing Wix contacts are reviewed. Do not treat order email addresses as newsletter subscriptions.
- Retain evidence of the applicable Google Workspace, Wix, Zeffy and Meta data protection terms.
- Provider research completed against public documentation on 5 November 2026. The directors should retain copies or links to the versions applicable to their accounts and check for updates at least annually. The precise Meta terms applicable to the CIC's Pages, Instagram account, direct messages and private group have not been individually confirmed. The CIC has confirmed that selecting Reject on the Wix cookie banner prevents non-essential cookies from being set. Do not claim UK-only storage for Google Workspace while default data region settings remain in use.
- Test the Wix cookie banner after selecting Reject: confirm that analytics, advertising and other non-essential cookies or similar technologies are not set before consent. Record the result and correct the settings if needed.
- Adopt the agreed retention schedule and establish a practical review and secure deletion process.
- Ensure volunteer moderator guidance covers confidentiality, sensitive disclosures and safeguarding escalation.
- Add the approved Privacy Notice link to the website and relevant Google Forms.

- Record a formal board decision approving the internal policy pack and the date of approval. Only then change the document status to Approved.

Part 13 – Optional baby and loss information: consent wording and handling

The questions about a baby's name and type of loss remain optional. A person can request a Comfort Box without answering them. The information is used to understand the family's circumstances when managing the request. Where a baby's name is provided, it is written on a personal card included in the Comfort Box. The information is not used for publicity or fundraising under this consent.

13.1 Proposed separate, unticked form checkbox

Optional – sharing details about your baby and loss

The questions about your baby's name and type of loss are optional.

If you choose to provide these details, I explicitly agree that Felix's Flame CIC can use them to understand my circumstances when managing my Comfort Box request.

If I provide my baby's name, I understand it will be written on a personal card included in my box.

I understand that I can leave these questions blank and still receive a Comfort Box. I can withdraw my consent at any time by emailing felixsflame@gmail.com. Withdrawing consent cannot undo something already written or sent.

This information will not be used for publicity or fundraising without separate permission.

Implementation note: this must be a separate, unticked checkbox and must not be bundled with the general Comfort Box request confirmation. The form should make clear that declining or withdrawing consent does not affect access to a box.

13.2 Recording consent and withdrawal

- Keep a record of the consent wording and form version shown to the person.
- Record the date and time consent was given and the specific optional information the person chose to provide.
- Make it possible for the person to withdraw consent by emailing felixsflame@gmail.com.
- When consent is withdrawn, stop using the information for the consented purpose and securely delete it where there is no other lawful reason to retain it.
- Explain that withdrawal cannot undo a card already written or sent, but no further use should be made under that consent.
- Do not reuse these details for publicity, fundraising, testimonials or unrelated purposes without separate permission and a fresh assessment.

13.3 Lawful basis and special category condition

The proposed approach is Article 6 consent and, where the information constitutes special category personal data, Article 9 explicit consent. The CIC must confirm whether the information being collected is special category personal data about an identifiable living person, and document the appropriate Article 9 condition before relying on it. The fact that a question concerns a baby or a loss does not automatically mean every answer is special category personal data; the context and whether it reveals information about an identifiable living person must be considered.

The CIC should not collect or use optional details until the final wording, form configuration, withdrawal process and lawful basis/condition have been checked and approved.

Part 14 – Comfort Box Google Form: current implementation

The following reflects the form changes and practices confirmed during the review. The form currently asks for the baby's name (optional) and type of loss (optional). It does not currently ask for the date of loss.

A separate consent checkbox has been added beneath these questions. It is optional and unticked by default. Families can submit a Comfort Box request without ticking it or answering the optional questions.

The agreed purpose for these optional details is:

- To help the CIC understand the family's circumstances when managing the Comfort Box request.
- Where a baby's name is provided, to write that name on a personal card included in the Comfort Box.
- The details are not used for publicity or fundraising under this consent.

14.1 Withdrawal of consent

A person may withdraw consent by emailing felixsflame@gmail.com. When consent is withdrawn, the CIC will stop using the optional baby/loss details for the consented purpose and delete those details from the Google Sheet where there is no other lawful reason to retain them. Basic request and delivery information may be retained where there is a separate lawful basis and an ongoing need to keep it. The CIC will record the withdrawal and the action taken.

Withdrawal cannot undo a personal card that has already been written or a Comfort Box already sent. The CIC must not make further use of the optional details under the withdrawn consent.

14.2 Existing request and dispatch information

The form already explains that Comfort Boxes are sent as funding becomes available and that requests are worked through in the order received. Families receive a shipping confirmation when their box is ready to be dispatched. The CIC does not send an automatic confirmation immediately upon form submission.

14.3 Final implementation checks

- Check that the consent checkbox is still optional and unticked by default.
- Check that the wording displayed in the live form matches the approved wording in Part 13.
- Ensure the Privacy Notice link is added to the form once the public notice is approved and published.
- Ensure the directors approve the Article 6 basis and any required Article 9 condition before relying on consent for special category information.

Part 15 – Reconciled Public Privacy Notice (website version)

This version is intended to replace the earlier public notice draft in Part 5 once the outstanding legal and provider checks have been completed. It reflects the systems and practices confirmed during the review. Do not publish until the directors have approved it and the final lawful bases and provider details have been checked.

Felix's Flame CIC

Company number: 17475609
Website: https://felixsflame.com
Contact: felixsflame@gmail.com

Last updated: To be completed on publication

1. Who we are

Felix's Flame CIC is a Community Interest Company supporting families affected by pregnancy and baby loss. We take the privacy of families, supporters, customers, donors, volunteers and others who contact us seriously. Felix's Flame CIC is responsible for deciding how and why personal information is used.

2. Information we collect

Depending on how you interact with us, we may collect your name, contact details and postal address; Comfort Box request information; your baby's name and type of loss if you choose to share them; messages and enquiries; feedback; shop order and transaction information; donation and donor records; and volunteer information. Some information about pregnancy, birth, health and bereavement may be sensitive personal information.

3. Comfort Box requests

Comfort Box requests are submitted through Google Forms. Responses are stored in a linked Google Sheet in our Google Workspace account. We use names, contact details and postal addresses to manage requests, communicate where necessary and arrange delivery. Requests are fulfilled as funding becomes available, in the order received. We send a shipping confirmation when a box is ready to be dispatched.

The questions about your baby's name and type of loss are optional. You can request a Comfort Box without answering them. If you choose to provide these details, we use them to understand your circumstances when managing your request. If you provide your baby's name, we use it to write a personal card included in your box. These optional details are not used for publicity or fundraising under this consent.

You can withdraw consent by emailing felixsflame@gmail.com. Where there is no other lawful reason to retain the optional details, we will stop using them for this purpose and delete them. Withdrawal cannot undo a card already written or sent.

4. Feedback

We use Google Forms to collect feedback about our Comfort Boxes and work. Email collection is switched off and the form is intended to be anonymous. Please avoid including names or identifying details in free-text answers. We use feedback to improve our work and may retain genuinely anonymous feedback for ongoing learning. If identifying details are included, we will remove them where possible.

5. Website and shop

Our website and online shop are operated through Wix. When you place an order, we may collect your name, contact details, delivery address, order information and transaction details. We use this information to process and fulfil purchases, arrange delivery, respond to queries and maintain necessary business and financial records. Shop payments are processed through Wix Payments and relevant payment processing partners. Customer order records remain within Wix and are not automatically treated as newsletter subscriptions.

6. Donations

We use Zeffy to process online donations. Zeffy provides donor and transaction records within our Zeffy account. These records remain within Zeffy and are not routinely downloaded or stored separately by Felix's Flame. Zeffy is used for donation processing and is not currently used by us to send fundraising emails.

7. Newsletters and marketing

Newsletter marketing is currently paused while we review our sign-up arrangements. Email addresses provided when placing an order are used for order-related communications and are not automatically treated as permission to receive marketing. If we resume newsletters, we will use an appropriate sign-up and permission process and provide an unsubscribe option.

8. Stories, photographs and personal experiences

Providing a story or photograph does not automatically give us permission to publish it. We seek separate permission before using identifiable stories, photographs, quotations or personal accounts publicly, and explain the intended use and platforms. Original submissions and permission records may be stored in Google Drive, with access restricted to the directors. We review requests to withdraw permission and remove material from future use where appropriate.

9. Social media and private support group

We use Facebook and Instagram to communicate and share information. Messages sent to us remain within the relevant platform inboxes and are not routinely copied into Google Drive or captured as screenshots. We also run a private Facebook support group where members may share personal and sensitive information. The group has written rules asking members not to screenshot, copy or share other members' posts outside the group. Authorised volunteer moderators may see posts to carry out moderation and are bound by confidentiality commitments. Facebook is an independent platform and we cannot guarantee that members will follow group rules.

10. Who we share information with

We share information only where necessary and appropriate. Depending on the service, this may involve Google, Wix, Wix Payments and relevant payment providers, Zeffy, delivery providers, and authorities where we have a legal obligation or an appropriate reason to protect someone from harm. We do not sell personal information or give family details to businesses for their own marketing.

11. Where information is processed

We use Google Workspace (including our email), Wix, Zeffy, Facebook and Instagram to operate our work. These providers may process information in locations outside the UK. Google Workspace is currently using its default data region settings, so we do not claim that all Google information is stored exclusively in the UK. We will check and keep under review the providers' information about processing locations, subprocessors and international transfer safeguards.

12. How we protect information

We take reasonable steps to protect information against loss, misuse, accidental disclosure and unauthorised access. Access is restricted to directors and authorised people who need information for their role. Two-step or two-factor verification is enabled on our main accounts. Access to individual records is restricted wherever possible.

13. How long we keep information

Our current retention periods include: completed Comfort Box requests, 12 months after delivery; unfulfilled or cancelled requests, 12 months after closure; general enquiries, 12 months after last contact; volunteer records, while volunteering plus 12 months; financial and accounting records, at least six years subject to applicable requirements; and story/photo permission records, while the material remains in use. Genuinely anonymous feedback may be retained for ongoing learning. We securely delete or anonymise information when it is no longer needed, unless there is a documented reason to retain it longer.

14. Cookies
Our website uses cookies and similar technologies. The Wix cookie banner allows visitors to accept, reject or manage non-essential cookies. You can use the cookie settings on the website to review your choices.

15. Your rights
Depending on the circumstances, you may have the right to access, correct or request deletion of your information, restrict or object to certain processing, and withdraw consent where we rely on it. Contact felixsflame@gmail.com to exercise your rights.

16. Complaints
If you have concerns about how we handle your information, please contact us first. You can also complain to the Information Commissioner's Office at https://ico.org.uk or by telephone on 0303 123 1113.

17. Changes to this notice
We may update this notice as our work, systems or data protection responsibilities change. The latest version will be available on our website.

15.1 Reconciliation notes
- The earlier public notice draft in Part 5 does not fully describe Zeffy donor records, Google Drive storage of original blog submissions and permissions, the current private-message handling practice, or the fact that Google Workspace uses default data region settings. Use this reconciled version instead once approved.
- The public notice deliberately does not name individual volunteers or include the CIC's registered office address.
- Before publication, confirm provider processing locations and international transfer safeguards, Wix cookie behaviour, and the lawful bases and any required Article 9 condition.
- The public notice should be dated with the actual publication date, not the draft date.

16. Provider processing and international transfers – research note

This section records a review of public provider documentation on 5 November 2026. It supplements the CIC's confirmation that the relevant provider terms have been accepted. It does not prove which contractual version is incorporated into each account, nor does it replace the directors' responsibility to retain the applicable terms.

Google Workspace (including email, Forms and Drive)

Google's current Workspace documentation describes a Cloud Data Processing Addendum and publishes a subprocessor list. The list identifies service activities and countries where processing may take place, including support and service-maintenance activity in a range of countries. The CIC uses default data-region settings, so it must not state that all Workspace information is stored only in the UK. The directors should retain the accepted terms and check the current subprocessor list periodically.

Official references:

Google Workspace privacy compliance and Cloud Data Processing Addendum: https://knowledge.workspace.google.com/admin/compliance/privacy-compliance-and-records-for-google-workspace-and-cloud-identity

Google Workspace subprocessors: https://workspace.google.com/intl/en/terms/subprocessors/

Wix (website, shop, customer records, Wix Payments and email marketing)

Wix publishes a Data Processing Agreement and a subprocessor list. Its published information identifies Wix entities and service providers in several countries, including the United States, Brazil, Mexico, India, Ukraine and countries in Europe. Wix says it uses appropriate safeguards for cross-border transfers, including Standard Contractual Clauses where required, and describes transfer impact assessments and additional measures. This supports describing Wix as a provider that may process data internationally; it does not establish the exact locations used for this particular website or account.

Official references:

Wix Data Processing Agreement: https://support.wix.com/en/article/wixs-data-processing-agreement-for-wix-users

Wix subprocessor list: https://support.wix.com/en/article/list-of-wixs-sub-processors

Wix Trust Center FAQ: https://www.wix.com/trust-center/faq

Zeffy (donations and donor records)

Zeffy's published DPA identifies its processor role for organisation-managed fundraising records and explains that it may also act as an independent controller for activities such as payment reconciliation, fraud prevention and legal compliance. The current DPA describes hosting on Amazon Web Services infrastructure in the United States and identifies subprocessors in the United States and Canada, including hosting, email delivery and data-pipeline providers. It describes use of Standard Contractual Clauses, the UK International Data Transfer Addendum and supplementary safeguards for relevant transfers. Zeffy's own privacy information also describes international transfers. The directors should retain the current DPA and check its subprocessor annex when it changes.

Official references:

Zeffy Data Processing Agreement: https://support.zeffy.com/data-processing-agreement-dpa-pma8j

Zeffy Privacy Policy (new organisations): https://support.zeffy.com/privacy-policy-new-organisations-6d7zh

Meta (Facebook, Instagram and private support group)

The CIC manages its Facebook and Instagram presence directly through the Facebook and Instagram apps, rather than Meta Business Suite, and views Facebook and Instagram Insights to understand reach and interactions. Meta acts as a separate controller for its platform services. For Page Insights, Meta's Page Insights Controller Addendum sets out joint-controller responsibilities for the processing used to produce Insights. The

directors should retain a copy or link to the Page Insights Controller Addendum and Meta Privacy Policy. Meta may process information internationally; relevant safeguards depend on the service and applicable terms. The CIC should not suggest that aggregate Insights identify individual visitors.

Official reference for Meta platform transfer terms (product-specific; check applicability): https://developers.meta.com/vr/policy/data-use/

Important: do not rely on the above Meta reference as proof that the same terms govern every Facebook or Instagram feature used by the CIC.

Outstanding checks before director approval

- Save or record the current provider agreements accepted in the relevant accounts, including the applicable version/date where shown.
- Check the current Google Workspace and Wix subprocessor lists and Zeffy's DPA annex when reviewing the pack annually or when notified of changes.
- Identify and retain the exact Meta terms applicable to the CIC's Pages, Instagram account, direct messages and private group; do not assume one Meta agreement covers every feature.
- Test the Wix cookie banner in a private browser session: reject non-essential cookies and check that analytics/advertising cookies do not load before consent. Record the outcome and adjust Wix settings if needed.
- Directors to formally approve the lawful basis register, legitimate interests assessments and retention schedule.
- If the directors cannot confidently determine whether optional baby/loss details or published family stories reveal special-category personal data about an identifiable living person, obtain data-protection advice before processing or publication. Record an Article 9 condition wherever one is required.

This research note is not a legal opinion. The public provider documentation can change, and account-specific settings and accepted terms take priority when determining the arrangements actually in force.

Meta references for the CIC's direct app use

Meta Privacy Policy: https://www.facebook.com/privacy/policy/

Meta Page Insights Controller Addendum:
https://www.facebook.com/legal/terms/page_controller_addendum

Meta information about Page Insights:
https://www.facebook.com/legal/terms/information_about_page_insights_data

The CIC confirmed that it manages Facebook and Instagram directly through the apps, not Meta Business Suite, and uses Insights to review reach and interactions. The Page Insights Controller Addendum is relevant to this analytics processing; it should not be presented as a general processor agreement covering every interaction, message or group post.

Meta Insights use confirmed

The CIC confirmed on 5 November 2026 that it views Facebook and Instagram Insights to monitor reach and interactions. The Privacy Notice should therefore explain that Meta provides aggregate statistics about how people interact with the CIC's Pages and that the Page Insights Controller Addendum describes the parties' responsibilities for the relevant processing.

Meta Page Insights Controller Addendum:
https://www.facebook.com/legal/terms/page_controller_addendum

Information about Page Insights data:
https://www.facebook.com/legal/terms/information_about_page_insights_data

17. Final director sign-off

The operational drafting and provider research have been brought together. The following items are the remaining sign-off actions. They are deliberately separated from the policy text so the directors can record what has actually been checked.

1. Confirm the live Comfort Box form matches Parts 13 and 14: baby's name and type of loss are optional; the consent checkbox is separate, unticked by default; a request can be submitted without answering or consenting; and the Privacy Notice link is added once published.
2. Approve the Article 6 lawful basis for each activity in Part 4 and the legitimate interests assessments in Part 10. Record the date and the directors' decision.
3. For optional baby/loss details and family stories, decide whether the information reveals special-category personal data about an identifiable living person. Where it does, record the Article 9 condition before processing. If uncertain, obtain advice.
4. The CIC has tested the Wix cookie banner and confirmed that selecting Reject prevents non-essential cookies from being set. Retain a brief record of the test and repeat it after material changes to the website or cookie settings.
5. Save the current Meta Privacy Policy and Page Insights Controller Addendum applicable to the CIC's Facebook and Instagram use. Check whether the current account terms provide any additional terms relevant to messaging or group administration.
6. Retain the current provider terms and review provider subprocessors and international transfer information at least annually or when notified of material changes.
7. Approve the internal Data Protection Policy, breach procedure, retention schedule, lawful basis register and assessments by a recorded director decision.
8. After approval, publish Part 15 as the public Privacy Notice, add its link to the website and relevant forms, and use the Google Forms wording in Part 6. Remove or clearly mark the earlier notice in Part 5 as superseded.

Director approval record

Decision: Approved by both directors.

Date approved: 5 November 2026

Approved by: Beth and Tom, Directors

Next review date: 5 November 2027, or earlier if there is a material change.

Do not fill in this approval record until the directors have actually considered and adopted the documents. The approval date must reflect the real decision date.