



#DefinitionRedefined

Privacy Notice

Effective from 00:01 on 26 October 2026, when the #DefinitionRedefined National Survey opens

1. Who we are and how this notice works

Soul Purpose 360 CIC is the data controller for the #DefinitionRedefined campaign and National Survey. This means we decide how and why your personal data is used, and we are responsible for protecting it.

- **Organisation:** Soul Purpose 360 CIC, a community interest company registered in England and Wales
- **Company number:** 12217224
- **ICO registration number:** ZB114850
- **Address:** Soul-Full, 62 George Street, Croydon, CR0 1PD
- **Email:** definitionredefined@soulpurpose360.co.uk (Monday to Friday, 10am to 5pm; we aim to reply within five working days)

This notice explains how we handle personal data across the campaign: the survey, sign-ups, contributions, messages, partners and our website. It works alongside the **#DefinitionRedefined National Survey Terms & Conditions**, which set out the rules for taking part. If the two ever appear to differ on how we use personal data, this Privacy Notice applies.

Our confidentiality promise: your survey answers are confidential. We will never publish your name or any detail that could identify you, and we only report results for groups of 10 or more people.

Who can take part: the survey is for women aged 18 and over and girls aged 16 to 17 who identify as Black, including women of mixed Black heritage, living in the UK. It is not for anyone under 16. If we find that someone under 16 has taken part, we will delete their answers where we can identify them.

2. What we collect and why

We only collect what we need for each activity. The lawful basis is our legal reason for using the data under the UK GDPR.

Activity	What we collect	Why we use it	Lawful basis
National Survey	Your answers, including sensitive answers; submission date and time; basic technical data needed to save your progress	To build national evidence on Black women's lives, campaign for change and inform the proposed National Commission	Consent; explicit consent for sensitive answers; research and statistical purposes with safeguards
Staying in touch (optional, at the end of the survey)	Name, email, mobile (optional), what you would like to hear about	To send updates and findings, or follow up if you asked us to	Consent



Activity	What we collect	Why we use it	Lawful basis
Campaign sign-up	First name, email, mobile (optional), town or borough, who you are signing up as, confirmation you are 16+, contact choices	To send campaign updates and invitations	Consent
Contributions (stories, recordings, photos, words, music)	Name, contact details, your contribution, credit choices, signed consent form; parent or guardian consent for under-18s	To share your story in the campaign, as you agreed	Consent
Messages and social media	Your messages, public usernames, posts or comments	To reply to you and manage our channels	Legitimate interests
Partners and funders	Work contact names, roles, emails, organisation details	To work together and share the toolkit and findings	Legitimate interests
Website	Basic technical and usage data	To keep the site working and, with your permission, understand how it is used	Legitimate interests; consent for analytics cookies
Safeguarding	Information suggesting serious risk of harm	To protect you or others	Vital interests; legal obligation; safeguarding of individuals at risk

Sensitive ("special category") data. Some survey questions ask about ethnic background, health and wellbeing, religion or belief, and experiences of abuse. Ethnic background is required, because the survey is for Black women and girls. All other sensitive questions are optional, and many include "Prefer not to say". We only use sensitive answers with your explicit consent, which you give in Section A of the survey.

Analysis by area. With your consent, we may analyse answers by region, London borough or local area. We only report area results for groups of 10 or more people.

3. Ownership of the survey data and findings

Soul Purpose 360 CIC owns the #DefinitionRedefined survey, its dataset and everything created from it.

- **What we own:** the survey questions and design, the survey database, the anonymised dataset, and all analysis, findings, reports, briefings and publications. This includes all copyright and database rights.
- **Your permission to us:** by submitting the survey, you give Soul Purpose 360 CIC a free, permanent, worldwide and irrevocable permission to use, analyse, quote, adapt and publish your anonymised answers.
- **Your story stays yours:** this permission does not stop you telling your own story in your own way, anywhere you choose.
- **Your data rights still apply:** while any of your answers can still identify you, you keep all your rights under data protection law (see Section 6).
- **No sale:** we will never sell your personal data or share it for anyone else's marketing. Funders, partners and the proposed National Commission receive anonymised findings only.



4. Who we share data with

Access to personal data is limited to a small, named Soul Purpose 360 team. We only share it as set out below.

Service providers (processors). These companies store or process data for us, only on our instructions and under contract:

- **MyT Automation / MyT CRM** (built on the GoHighLevel platform): the survey form, sign-ups and messages
- **Canva:** campaign designs
- **Our email and secure cloud file storage providers:** email, documents and digital copies of consent forms

If we move the survey to a different platform, or appoint a research partner or university, we will name them here before any data is shared with them.

Others who may receive data:

- **Funders, partners and the proposed National Commission:** anonymised findings only, never personal data
- **Social media platforms** (Instagram, Facebook, LinkedIn, TikTok, YouTube): only contributions you have agreed we can publish
- **Emergency services, safeguarding authorities, regulators or courts:** only where required to protect someone or by law

International transfers. Some of our providers, including MyT Automation and Canva, may store data outside the UK, including in the United States. When this happens, your data is protected by the UK-US data bridge or UK-approved transfer agreements.

5. How long we keep data

We keep survey data for long-term research, so that future surveys can be compared with this one and the evidence can support the proposed National Commission. When a retention period ends, we securely delete the data or fully anonymise it.

Data	How long we keep it
Fully anonymised survey dataset, findings and reports	Permanently, as they cannot identify anyone
Original survey answers (de-identified within 30 days of submission)	Until 31 December 2032, for research and statistical purposes, then fully anonymised or deleted
Staying in touch and campaign sign-up details	Until you unsubscribe, or 24 months after our last contact with you, whichever is sooner
Contributions and signed consent forms	For as long as we use the contribution, plus 6 years
Messages to our inbox and social media	24 months after the matter is resolved
Safeguarding records	6 years after the last action, or longer if required by law
Partner and funder contacts	Until you ask us to stop, or 24 months after our last contact, whichever is sooner



De-identification. Within 30 days of each submission, we remove direct identifiers, such as names, contact details and specific places, from survey answers. Survey answers are always stored separately from contact details.

6. Your rights

You have the right to access, correct or delete your personal data, to restrict or object to how we use it, to data portability, and to withdraw your consent at any time. Withdrawing consent does not affect how we used your data before you withdrew. We respond to requests within one month and may need to check your identity first.

Withdrawing your survey answers. You can ask us to withdraw your survey answers within 30 days of submitting. Email us with the date and approximate time you submitted. After 30 days, your answers are de-identified and can no longer be linked to you, so they cannot be withdrawn. Published findings cannot be withdrawn.

Unsubscribing. Use the link in any email, reply STOP to a text, or tell us on WhatsApp.

7. Safeguarding

If something you share suggests that you or someone else is at serious risk of harm, we may share relevant information with emergency services or safeguarding authorities, even without your consent. Where it is safe to do so, we will tell you first. The survey is not monitored in real time, so in an emergency, call 999.

8. How we keep data safe

- Access limited to a small, named team, with passwords and two-step verification
- Survey answers and contact details stored in separate systems
- Paper consent forms kept in a locked cabinet at Soul-Full; digital copies in access-restricted folders
- Any data breach handled quickly, reported to the ICO and to affected people where required

9. Cookies

Our sign-up and survey pages use essential cookies to work, including saving your survey progress. Analytics cookies are optional and only used with your permission. You can accept or refuse them using the cookie banner and change your choice at any time.

10. Complaints

Please contact us first at definitionredefined@soulpurpose360.co.uk. We will acknowledge your complaint within 30 days. You also have the right to complain to the Information Commissioner's Office at ico.org.uk/make-a-complaint or on 0303 123 1113.



11. Changes to this notice

We publish updates at [soulpurpose360.co.uk/definitionredefined](https://www.soulpurpose360.co.uk/definitionredefined) and email you about significant changes if you have signed up for updates.