Privacy Policy

Context

This campaign and its website are backed by Breakthrough, working in partnership with **LABRATS (Legacy of the Atomic Bomb: Recognition for Atomic Test Survivors) CIC**, company number 12874772, of Lletty-Dau-Filwr, Llanddarog Road, Carmarthen, SA32 8BG.

When you sign up on this site, a single sign-up box covers both organisations. By ticking it, you're agreeing to hear from both:

- **LABRATS**, who lead this campaign and decide what it says and does.
- **Breakthrough** (registered company name Impact Accelerator Ltd, company no. 13065812), the non-profit that provides the digital and campaign infrastructure behind this campaign and others it backs.

Even though joining is a single step, **you can unsubscribe from either one at any time, independently of the other** - opting out of Breakthrough's updates doesn't remove you from LABRATS' campaign list, and opting out of LABRATS' campaign updates doesn't remove you from Breakthrough's. Every email includes an unsubscribe link that lets you choose.

Who's responsible for your data

- **LABRATS CIC is the data controller** for the list of people who sign up to hear from this campaign. LABRATS decides what campaign updates go out and is legally responsible for that list.
- **Breakthrough (Impact Accelerator Ltd) is the data controller** for its own, separate list - people who've additionally chosen to hear about Breakthrough's wider work supporting other campaigns.
- **Breakthrough acts as data processor for LABRATS' campaign list.** We host it and provide the technical platform (via Action Network — see Section 13), and send emails LABRATS has approved, only on LABRATS' instructions.

If you'd like this explained further, get in touch using the details in Section 15.

The purpose of this policy is to help you understand what personal information is collected, how it's used, and what your rights are. It may change from time to time, so please check back periodically.

1. The information we collect about you, and how

We collect personal information about you in a number of ways, including when you:

- Sign up to this campaign, or another campaign backed by Breakthrough
- Sign up directly to hear from Breakthrough on its own website
- Sign up to donate to LABRATS or to Breakthrough
- Engage with our social media or digital advertising
- Apply to, or take part in, LABRATS' or Breakthrough's programmes
- Apply for a job with LABRATS or Breakthrough
- Visit our websites
- Contact either team directly

We'll always make sure we have a proper legal justification for collecting and using your personal information. Depending on the circumstances, this will be one of:

- Your consent
- What's necessary for us to comply with a legal obligation
- Our legitimate interests — for example, understanding how our campaigns are performing, or safeguarding — used only where it wouldn't be intrusive and doesn't override your rights. **We do not rely on legitimate interests to send you marketing or campaign emails - that's always based on your consent** (see Section 11).
- What's necessary to perform a contract with you

Pixel trackers

We use pixel trackers in emails to understand how people interact with our communications — for example, whether an email was opened or a link clicked. This helps us understand what content people are interested in, and protects our emails from being wrongly flagged as spam. You can block these by adjusting your email client to stop images loading automatically.

2. What personal information do we collect?

We may collect, store and use:

1. Your name and contact details — address, phone number, email, social media identity — and other relevant information, such as why you've contacted us, your views on the campaign, or your survey responses.
2. Information about your device and visits to our websites — IP address, general location, browser type, referral source, and page views.
3. Details of the campaigns you've supported and your communication preferences.
4. Anything else you share with us as described above.

Special category data

Some personal information — health information, ethnicity, political opinions — needs extra protection under the law ("special category" data). Given the nature of this campaign, we may

collect health-related information relevant to nuclear test veterans' experiences, where you choose to share it. We will always seek your explicit consent before collecting this, and only use it for the purposes you've agreed to.

We may also need to process special category or criminal-offence-related data where necessary for substantial public interest reasons, such as safeguarding.

3. How and why we use your personal data

We use your personal information to:

- Help you use and learn about what we offer
- Send you information about this campaign and, separately, about Breakthrough's wider work — only where you've consented to each
- Send surveys, including for supporter research (Sections 5–6)
- Provide services, information, or products you've requested
- Handle donations or other payments you make
- Handle the administration of employment with LABRATS or Breakthrough
- Research the impact of this campaign
- Deal with enquiries or complaints
- Submit your support to third parties where you've signed this campaign and the third party is a target of it (for example, government or parliamentary recipients)
- Use your data in promotional activity, but only with your consent
- Administer our accounts

4. Signing this campaign

When you sign this campaign, we ask for some personal information and take reasonable steps to keep it accurate and up to date.

Signing indicates your public support for the campaign's aims. Please be aware that when you sign:

- Your name, postcode, and (if supplied) mobile number will be made available to LABRATS as the campaign's creator.
- LABRATS may export the campaign, together with anything you've posted in connection with it, and send it to the individual or organisation being petitioned - which may include publishing or publicly displaying your involvement.

5. Supporter surveys

We may occasionally invite you to complete a survey. Participation is entirely voluntary, and you don't have to answer anything you'd rather not. We'll use your responses for the purposes set out in this policy, including to understand our supporters better.

6. Communications, campaign updates, and marketing

When you sign up, you're agreeing — in one step — to hear from both LABRATS about this campaign and Breakthrough about its wider work.

You can stop hearing from either organisation at any time, and you don't have to opt out of both together. Click "unsubscribe" at the bottom of any email to come off that particular list — LABRATS' campaign updates or Breakthrough's own updates — or contact us using the details in Section 15 to specify which you'd like to stop.

If you'd like to opt out of post, please email campaigns@breakthroughimpact.org.

7. Members of Parliament

We collect and use limited information about MPs, including publicly available voting records, contact details, information from members of the public about MPs' responses to issues raised, and information MPs provide us directly. We use this to send briefings, ask questions relevant to the campaign, and enable members of the public to contact their MP through our systems. We rely on legitimate interests for this processing.

8. Children's data

We do not knowingly process the data of anyone under 16. If we discover, or have reason to believe, that we hold personal information about someone aged 15 or under, we will delete it within a reasonable period and withhold our services accordingly.

9. Security of and access to your personal information

We maintain appropriate technical and organisational measures to protect your personal information from loss, misuse, or unauthorised access.

Your information is only accessible to appropriately trained LABRATS and Breakthrough staff who need it to run this campaign. Breakthrough hosts campaign data on Action Network, a third-party platform (see Section 13).

We may also use other agencies or suppliers to process data on our behalf, always under contract. In addition to disclosures reasonably necessary for the purposes set out in this policy,

we may disclose information to regulatory, government, or law enforcement bodies where legally required.

10. Your rights

Under data protection law, you have the right to:

- Be informed about how your data is used
- Withdraw consent at any time, where we're relying on it
- Have inaccurate or incomplete data corrected
- Request deletion of your data in certain circumstances
- Restrict our processing where there's a dispute about accuracy or lawfulness

Subject access requests. You can ask for a copy of the information we hold about you. Requests relating to this campaign are the responsibility of LABRATS as controller; Breakthrough supports the technical side. We'll respond within one month, and may ask for proof of identity. To make a request, contact campaigns@breakthroughimpact.org.

You also have the right to complain to the Information Commissioner's Office — details here.

11. Our lawful basis

We rely on the following grounds, depending on the purpose:

Consent. We rely on your consent specifically for electronic communications — newsletters, campaign updates, marketing, and fundraising emails. When you sign up, one consent action covers hearing from both LABRATS about this campaign and Breakthrough about its wider work, and this is made clear to you at the point of signing up. You can withdraw consent for either organisation independently at any time (see Section 6).

Contractual relationships. Occasionally necessary — for example, if you apply for employment or to volunteer.

Legal obligations. Where we're legally required to process your data.

Legitimate interests. Used only for purposes other than electronic marketing — for example, understanding campaign impact or safeguarding — and only where fair, balanced, and within your reasonable expectations.

Special category data. Where applicable, we rely on either your explicit consent, or (for non-profit bodies with a political or philosophical aim) the "legitimate activities" condition permitted under data protection law, or the substantial public interest condition for safeguarding purposes.

12. How long we keep your personal information

We generally remove your personal information from our records six years after it was collected, unless it's still needed for the purpose it was collected for. If, before that point, it's no longer needed, we're no longer entitled to hold it, or you validly exercise your right of erasure, we'll remove it sooner.

If you ask us to stop sending you communications, we'll keep a minimal record on an internal suppression list, purely to make sure you're not contacted again by mistake.

13. Sharing your information

We use Action Network, a US-based platform, to host and send campaign communications. Personal data transferred there is protected under Action Network's UK/EU data transfer arrangements, details of which are available on request.

We use other third-party service providers to help deliver our services, always under contract preventing them from using your data beyond the purposes in this policy.

We may share your information with public authorities where legally required, or where necessary for substantial public interest reasons such as preventing or detecting crime.

Where you've consented, we may share your information to make campaign submissions to third parties — for example, sharing your name and postcode when handing in a petition — or for promotional purposes.

14. Changes to this policy

We review this policy regularly and will update it from time to time to reflect changes in the law or our practices. We recommend checking back occasionally. Where reasonably possible, we'll notify you by email of significant changes.

15. Contact us

For anything relating to how your data is used, contact:

campaigns@breakthroughimpact.org

Or write to:

Impact Accelerator Ltd Gather Round 15–16 Brunswick Square Bristol, England, BS2 8NX

LABRATS (Legacy of the Atomic Bomb: Recognition for Atomic Test Survivors) CIC, company no. 12874772, can be written to at:

Lletty-Dau-Filwr, Llanddarog Road Carmarthen, SA32 8BG *Last updated: 14 July 2026*