



# Children and Young People's Empowerment Project

## Privacy Policy

How we respect privacy when we deal with personal information collected by our organisation

This Privacy Policy applies to information we Chilypep collect about individuals who interact with our organisation. It explains what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us at [info@chilypep.org.uk](mailto:info@chilypep.org.uk)

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Our full contact details are:

Full name of legal entity: The Children and Young People's Empowerment Project (Chilypep)

Name of data privacy manager: Lesley Pollard, Chilypep Managing Director

Email address: [Lesley.pollard@chilypep.org.uk](mailto:Lesley.pollard@chilypep.org.uk)

Postal address: 11 Southey Hill, Sheffield S5 8BB

Telephone number: 0114 2348846

Our Website: [www.chilypep.org.uk](http://www.chilypep.org.uk)

# 1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

Purpose	Data (key elements)	Basis
Enquiring about our organisation and its work	Name, email, phone number, message	Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect.
Gaining consent from the parent, carer or guardian of the children and young people we work with	Name, address, email, phone number, of parent/carer or guardian.	Consent - you have given your active consent for us to work with the children/young people you are the parent/carer/guardian for. Legitimate Interests - It is necessary for us to gain consent including relevant information in order to work with children and young people Statutory obligation - we have a statutory obligation in respect of safeguarding and health and safety legislation
Ensuring the health and safety of the children and young people we work with	Name, address and phone number of emergency contact and health care professional	Legitimate Interests - It is necessary for us to be able to contact emergency contacts or health professionals to meet the needs of the children and young people we work with and ensure their safeguarding, health and safety Statutory obligation - we have a statutory obligation in respect of safeguarding and health and safety legislation.
Engaging with the services we offer.	Name, address, email, phone number, date of birth, equalities data	Legitimate interests - it is necessary for us to read and store your information so that we can respond to you or your child in the way that you would expect. Performance of Contract - it is necessary for us to gather demographic data in order to meet the requirements of our funders and commissioners and to report to our supporters and the general public about our activity. Data is anonymised before being shared with any third parties Statutory obligation - we have a statutory obligation in respect of safeguarding and health and safety legislation.

Subscribing to email updates about our work	Name, email, address, phone number	Consent - you have given your active consent.
Making a donation	Name, email, address, phone number, payment information	Legitimate interests - this information is necessary for us to fulfill your intention of donating money and your expectation of receiving a confirmation message.
Signing up as a member	Name, address, email, phone number	Contract - by becoming a member you have entered into a contractual relationship with us as set out in our membership terms and conditions.
Website functionality	Website activity collected through cookies	Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering the contents of your enquiry before you have fully completed the process.

**Lawful Basis:**

*Legitimate Interest* means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

*Performance of Contract* means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

*Comply with a legal or regulatory obligation* means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

## 2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- reply to enquiries you send to us;
- handle donations or other transactions that you initiate;
- where you have specifically agreed to this, send you marketing communications by email relating to our work which we think may be of interest to you.

- Invite you to get involved in our work, for example helping to fundraise or attending an event
- Collate anonymised data to share with funders and supporters in order to report on our work

### 3. When we share your data

We will only pass your data to third parties in the following circumstances:

- you have provided your explicit consent for us to pass data to a named third party;
- we are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors; or
- we are required by law to share your data.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

### 4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent at least every three years.

### 5. Rights you have over your data

You have a range of rights over your data, which include the following:

You have the right to:

*Request access to your personal data* (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

*Request correction of the personal data that we hold about you.* This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

*Request erasure of your personal data.* This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

*Object to processing of your personal data where we are relying on a legitimate interest* (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights

and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

*Request restriction of processing of your personal data.* This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

*Request the transfer of your personal data to you or to a third party.* We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

*Withdraw consent at any time where we are relying on consent to process your personal data.* However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

## 6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>.

## 7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

24<sup>th</sup> May 2018