

# PRIVACY & GDPR POLICY

**APPROVED BY:** 

**Directors** 

LAST REVIEWED: 07/07/22

**NEXT REVIEW:** 

07/07/23



# **About this Policy**

This policy explains what types of personal information will be gathered when you visit the Community Court Yard websites, and how this information will be used. If you follow a link to any other website, please check their policies before you submit any personal information to those websites.

By using, or registering on our websites you consent to the collection, use and transfer of your information under the terms of this Privacy Policy.

The Community Court Yard takes your privacy seriously. This policy outlines the use of personal data under the Data Protection Act 2018 and the General Data Protection Regulations ("GDPR") For the purpose of DPA and GDPR Community Court Yard are the data controller and any enquiry regarding the collection or processing of your data should be addressed to Community Court Yard's Data Protection Officer c/o Community Court Yard 41 Lea Road, Abington, Northampton, NN1 4PE.

### Your Personal Data- What Is It?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone, or in conjunction with any other information in the data controller's possession, or likely into their possession.

### Information We Collect

Personal infraction includes identifiers such as; your name, date of birth, email address, postal address, telephone number, as well as information you provide in any communications between us. You will have given us some or all of this information through:

- your interactions with us including; registering on our mailing list, using our website, joining our online forum, making a booking on our website, attending an event, youth club/ activity or training course and seeking advice/support.
- your interactions with others including marketing a booking at our youth centre, The Yard, booking onto an event via Eventbrite, using PayPal or SagePay or to pay for a product / service and provide your consent for your personal information to be shared with us.

When you visit our website, we collect information to help us to understand how our stakeholders use the site. This information consists of your IP address,



your internet brower, the time anddate of when you visited and which pages you visited or downloaded. We cannot use this information to find out further personal information about you, but simply allows us to make improvements and tailor our offer to our stakeholders.

We aim to ensure that our communications to you are relevant and timely. to enable us to do this, we may also analyse publicly available geographic, demographic and other information relating to you, to better understand your interests and preferences.

### How the Information Collected Is Used

Community Court Yard complies with its obligations under the "GDPR" by keeping personal information up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unathourised access and disclosure and by ensuring that appropriate technical measure are in place to protect personal data.

We will process your personal data based on your consent, and / or because we need to use it in order to fulfill a contract with you (e.g because you have subscribed to our membership, engaged with our programmes and / or legitimate interest).

Legitimate interest means there is a valid reason for Community Court Yard to do so. This could include; making improvements to our services, to manage relationships with our support and to comply with relevant legislation. Whenever we process your information in this way, we ensure tht we consider your rights and interests.

We will never sell or swap your details. We may share your information with trusted third parties in the process of managing your engagement with us, such as the payment processing of donations or to partners who manage our events.

We use your personal data for the following purposes:

- To enable us to provide support and advice for the benefit of those working with children and young people with the Youth Sector.
- To administer membership subscriptions and activities;
- To fundraiser and provide the interests of the organisations;
- To manage our recruitment processes, employees, directors and volunteers;
- To maintain our own accounts and records:



- To inform you of news, events activities and services offered by Community Court Yard;
- To deliver social education / alternative education at The Yard.

Personal information provided to the organisation by you will only be used for the purposes stated when the information is requested. Personal information will not be sold to third parties, or provided to direct marketing companies or other such organisations without your permission.

# What is the legal basis for processing your personal data?

- Explicit consent of the data subject so that we can keep you informed about news, events, activities and services offered by Community Court Yard.
- Processing is necessary for carrying out legal obligations.
- Sharing of information with partners or third parties is only done so where consent has been provided.
- However, we may disclose your information to regulatory bodies to enable us to comply with the law and to assist fraud protections and minimise credit risk.
- Please be advised that we do not reveal information about identifiable individuals to our stakeholders without consent from the data subject, but we may, on occasion provide them with anonymised information.

## Protecting Children and Young People

Where we believe any of our services may attract children and young people under the age of 16, we will clearly provide information notices to try and deter children from providing their personal data without parent or guardian consent.

We do not knowingly intend to send marketing communications to children and young people. We actively encourage all our staff, wherever they are implementing new initiatives to assess whether these might be attractive to children and young people and if so, will ensue clear information is provided to try and deter children and young people from providing their personal data without parent or guardian consent.

If you are a parent or guardian and are concerned that we may be processing personal data related to your child, please email shout@communitycourtyard.org or write to the Data Protection Officer, c/o Community Court Yard 41 Lea Road, Abington, Northampton, NN1 4PE.



### How we Store Information Collected

As part of the services offered to you, for example through our websites, the information you provide to us may be transferred to and stored in countries outside of the European Economic Area (EEA) as we use remote website server hosts to provide the website and some aspects of our service, which may be based outside of the EEA, or use serviers based outside of the EEA - this is generally the nature of data stored in "the Cloud". It may also be processed by staff operating outside the EEA who work for one of our suppliers e.g. our website server host, or who work for us when temporarily based outside of the EEA.

A transfer of your personal data may happen if any of our services are located in a country outside of the EEA or one of our service providers is located in a country outside of the EEA. If we transfer or store your personal data outside the EEA in this way, we will take steps to ensure that your privacy rights continue to be protected, as outlined in this privacy policy and in accordance with the DPA and GDPR. If you use our services whole you are outside the EEA, your personal date may be transferred outside the EEA in order to provide you with these services.

We do not use or disclose sensitive personal data, such as race, religion, or political affiliations, without your explicit consent.

We may disclose your personal data outside of Community Court Yard e.g. data analysis or newsletter mailings. However, any such transfer will only be on terms that ther confidentiality of your personal data is protected and the terms of this privacy policy will continue to be complied with by the recipient.

We will process, disclose or share your personal data only if required to do so by law, or in good faith believe that such action is necessary to comply with legal requirements, or legal process served on us or our websites.

You have the right to opt out of us processing your personal data for marketing purposes by contacting the Data Protection Officer via email at shout@communitycourtyard.org.

## Security

The transmission of information via the Internet or email is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data while you transmitting it to our site; any such transmission if at your own risk. Once we have received your personal data,



we will use strict procedures and security features to try and prevent unauthorised access.

# The Use of Trusted Partners and Suppliers

We use the external companies such as Eventbrite to collect or process personal data on our behalf. We undertake checks on these companies before we wrk with them and put agreements in place that require them to comply with data protection legislation and ensure that they have appropriate controls in place to secure your information.

### How we use "Cookies"

Most of our web pages use cookies. A cookie is a small file of letters and numbers that we place on your computer or mobile device if you agree. These cookies allow us to distinguish you from other users of our websites, which helps us to provide you with a good experience when you browse our website and also allow us to improve our websites.

# Your Rights and Your Personal Data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

The right to request a copy of your personal data which Community Corut Yard holds about you; where possible this will be provided within 30 days of request. If an extension is required due to the complexity of he request, then this will be agreed in writing by both parties;

The right to request that Community Court Yard corrects any personal data if it is found to be inaccurate or out of date;

The right to request your personal data is erased where it is no longer for Community Court Yard to retain such data;

The right to withdraw your consent to the processing at any time;

The right to request that the data controller provide the data subject with his / her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].

The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further learning. The right to object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest / exercise of official authority);



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### How we use "Cookies"

Most of our web pages use cookies. A cookie is a small file of letters and numbers that we place on your computer or mobile device if you agree. These cookies allow us to distinguish you from other users of our websites, which helps us to provide you with a good experience when you browse our website and also allow us to improve our websites.

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- 4. The right to withdraw your consent to the processing at any time;
- 5. The right to request that the data controller provide the data subject with his / her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable) [Only applies where the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means].
- 6. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further learning.
- 7. The right to object to the processing of personal data, (where applicable) [Only applies where processing is based on legitimate interests (or the performance of a task in the public interest / exercise of official authority);



direct marketing and processing for the purposes of scientific / historical research and statistics]

8. The right to lodge a complaint with the Information Commissioners Office, https://ico.org.uk

# Further processing

if we wish to use your personal data for a new purpose, not covered by your consent, then prior to commencing the processing we will provide you with a new notice setting out the relevant purposes and processing conditions. Where and when necessary, we will seek your prior consent to the new processing.

# Controlling the use of Your Data

Ilf you have given us consent to use your data for a purpose you can revoke or vary that consent at any time. If you don't want us to use your data, or want to vary the consent that you have provided you can email shout@communitycourtyard.org or write to Data Protection Officer, c/o Community Court Yard, 41 Lea Road, Abington, Northampton. NN1 4PE.

# Changes to our Privacy Policy

From time to time, we may use your inforamtion for new, unanticipated uses not previously disclosed in our privacy policy. If our inforamtion practices change at some time in the future we will post the policy changes on this page.

If you are concerned about how your information is used, you should check this page periodically.

### Contact Details

To exercise all relevant rights, queries of complains please in the first instance contact our data controller and Data Proection Officer by emailing shout@communitycourtyard.org or via post c/o Community Court Yard, 41 Lea Road, Abington, Northampton. NN1 4PE. You can contact ther Information Commissioners Office on 0303 123 1113 or via email: https://ico.org.uk/global/contact-us/email/