DATA PRIVACY POLICY

WIZEUP FINANCIAL EDUCATION

1. Data Protection Policy

1.1 Our Aims

WizeUp Financial Education aim to follow the UK General Data Protection Regulation (UK GDPR), along with the Data Protection Act 2018. This policy will apply to all personal data, whether this be in hard or electronic copies.

- **Personal Data is defined as any information relating to an identified, or identifiable, individual. This may include the individual's:**

- **Name**
- **Identification Number**
- **Location Data**
- **Online Identifier, such as username**
- **It may also include factors specific to the individuals physical, psychological, genetic, mental, economic, cultural or social identity.**

- **Special Category Data is personalised data which is more sensitive and so needs more protection, including information about an individual's:**

- **Racial or ethnic origin**
- **Political opinions**
- **Religious or philosophical beliefs**
- **Trade union membership**
- **Genetics**
- **Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes**
- **Physical or mental health or condition**
- **Sex life or sexual orientation**

- **Processing can be defined as anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying. Processing can be automated or manual.**

- **Data subject, according to the Information Commissioner's Office, personal data is information that relates to an identified or identifiable individual.**

- **Data Controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.**

- **Data Processor, according to the Information Commissioner's Office, a Data Processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller. Processors act on behalf of the relevant controller and under their authority. In doing so, they serve the controller's interests rather than their own.**

- **Consent, according to the Information Commissioner's Office, consent is defined as any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".**

- **Personal Data Breach, according to the Information Commissioner's Office, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes.**

Primary person who is responsible for implementation and maintenance of this policy.	Michael Flack
Review Date	July 2027
Adopted	August 2026
Next review	July 2027

2. Data Controller

WizeUp Financial Education is the Data Controller for the personal data it collects and processes in connection with its charitable activities. The Trustees have appointed Michael Flack as the charity's nominated lead for data protection compliance.

The charity is responsible for determining the purposes for which personal data is processed and ensuring that processing is carried out in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Day-to-day responsibility for data protection compliance has been delegated to the Data Controller, who acts on behalf of WizeUp Financial Education and serves as the primary point of contact for data protection matters.

Contact:

Email: office@wizeupfinancialeducation.co.uk

WizeUp Financial Education is registered with the Information Commissioner's Office (ICO) and complies with its obligations as a data controller.

3. Roles & Responsibilities

All trustees and volunteers hold the responsibility in making sure they follow everything that has been put forward within this policy. Failure to do so may result in disciplinary action.

4. Data Protection Officer

In the considered opinion of the Trustees, the scope and nature of the personal data held by the charity is not sufficient to warrant the appointment of a Data Protection Officer.

Access to personal data will be restricted to trustees, staff, associates and volunteers who require it to carry out their duties on behalf of WizeUp Financial Education.

All individuals with access to personal data are expected to handle it confidentially and in accordance with this policy.

5. Trustees

The Board of Trustees will continue to make sure that the Data Protection policy is followed and hold the right to make changes to the charity's nominated data protection lead.

6. Associates or those involved with WizeUp Financial Education

Associates or those working with WizeUp Financial Education should inform the charity's nominated data protection lead of any changes to their personal data.

They should also approach the charity's nominated data protection lead regarding:

- Any questions or concerns regarding the actions of this policy.
- If they are unsure whether they can use personal data in a specific way.
- If there has been a data breach or if they are uncertain as to whether one may have occurred.
- Whenever they are involved within an activity that might breach privacy rights.
- Should they be sharing any information with third parties.
- Be reliant on consent, privacy notices, data protection rights or transferring data outside of the charity.

7. Data Protection Principles

WizeUp Financial Education are committed to following the data principles set out by the UK GDPR. These include that personal data must be:

- Processed lawfully, fairly and in a transparent manner.
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and kept up to date.

- Kept in a form which permits identification of data subjects for no longer than is necessary.
- Processed in manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

8. Collecting Personal Data - Lawfulness, fairness and transparency

We will only process and register personal data if:

- We need to comply with a legal obligation.
- Ensure the vital interests of an individual.
- Perform a task within the public interest and carry out the charities commitments.
- An individual has given clear consent.

For special categories of personal data, we will also meet one of the special category conditions for processing which are set out in the UK GDPR and Data Protection Act 2018. Further information can be found on the ICO's website.

9. Collecting Personal Data - Limitation, minimisation and accuracy

We will only use an individuals personal data for legitimate reasons, explaining to them why we need it when on collection.

An individual will always been notified should we wish to use their personal data for other reasons following on from the original moment of collection.

Once information is not needed anymore, it must be deleted or anonymised with immediate effect.

10. Sharing Personal Data

WizeUp Financial Education will only share personal data where there is a lawful basis to do so.

Personal data may be shared:

- With schools, colleges, alternative provision settings and educational partners where necessary for programme delivery.
- With approved service providers who support the operation of the charity, including providers of email, cloud storage, online forms and data management systems.
- Where required by law, regulation, court order or a request from law enforcement agencies.

- Where it is necessary to protect an individual's vital interests or safeguard a child or vulnerable person.

Any organisation processing personal data on behalf of WizeUp Financial Education will be required to provide appropriate safeguards for that data.

11. Subject Access Requests and other rights of individuals

Individuals may make a 'subject access request' (SAR) to gain personal information to which WizeUp Financial Education holds about them. Any request must be made directly to the charity's nominated data protection lead.

WizeUp Financial Education will acknowledge receipt of an SAR within 48 hours and will respond substantively within one month of receipt.

The Information Commissioner's Office guide provides very useful background information and is essential reading for those who have to deal with SARs.

Finally, all communications from WizeUp Financial Education must be made through the address office@wizeupfinancialeducation.co.uk. No trustees or associates must use their personal email as this would in effect breach data security for that individual and, in some instances, potentially open safeguarding risks.

12. Children and subject access requests

Children hold the right to their personal data, not their parents or carers. A parent or carer may only make an access request should their child not be able to understand their rights or if the child has given consent.

Children who are 12 or above are deemed as mature enough to make a decision regarding a SAR. Therefore, parents or carers would not be granted access to their Childs data without the Childs permission.

13. Information needed in order to submit a SAR

To complete a SAR, the charity's nominated data protection lead will require:

- Two forms of identification.
- A conversation to confirm subject access has been requested. The request can be made via phone, Zoom/Teams or in writing.
- Ask for a submission in writing. However, we recognise that this may present an obstacle for some individuals, so where necessary we will accept a request by other means.

We will not disclose any information should we feel that the information will put the person, especially the child, in danger.

WizeUp Financial Education will not normally charge a fee for responding to a Subject Access Request.

However, where a request is manifestly unfounded, excessive or repetitive, the charity reserves the right to charge a reasonable administrative fee or refuse the request in accordance with UK GDPR requirements.

14. Other data protection rights of the individual

Any individual may withdraw their consent at any time, this may be for marketing usage or other such means. Furthermore, they may issue a complaint with the ICO should they feel WizeUp Financial Education are not fulfilling their responsibilities correctly. Any requests or questions must be put to the charity's nominated data protection lead in writing.

15. Photographs and Videos

Some WizeUp events may have photographs or videos created.
Should this be the case WizeUp will seek to obtain written permission from the parent/carer/pupil involved, explaining clearly how the images will be used. This process should be communicated clearly to the school, college or academy at least seven days ahead of the visit.

Footage may be used on our website, social media pages or for other marketing materials. Furthermore, images may be used by external sources such as newspapers, advertisements and campaigns.

Consent can be withdrawn at anytime. Should this happen the image or footage will be deleted with immediate effect.

Any images or videos used will not involve any further information of the child within the image in order to make sure they are unidentifiable.

16. Disposal of Records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

17. Personal Data Breaches

WizeUp Financial Education will make all reasonable endeavours to ensure that there are no personal data breaches.

In the event of a suspected data breach, we will report the data breach to the ICO within 72 hours. Such breaches could include, but are not limited to:

- A non-anonymised dataset being published on a website which shows sensitive personal data

- Safeguarding information being made available to an unauthorised person.

- The theft of a laptop containing non-encrypted personal data about trustees, staff, associates or our clients.

18. Training

All trustees, staff and associates will be provided with data protection training as part of their induction process. Refresher training will also be provided before the start of each academic year. The key topic being covered in training will be what to do if a data breach occurs.

19. Monitoring

The charity's nominated data protection lead is responsible for the day to day management and operation of this policy, including its continuing appropriateness and applicability. The Trustees will formally review the policy every two years from its inception unless circumstances dictate that it should be considered earlier.

20. Data Retention

WizeUp Financial Education will only retain personal data for as long as necessary to fulfil the purposes for which it was collected, including to satisfy legal, regulatory, safeguarding, accounting and reporting requirements.

When personal data is no longer required, it will be securely deleted, destroyed or anonymised.

The charity will review retained information periodically to ensure it remains necessary and proportionate.

Different categories of information may be retained for different periods according to legal, safeguarding, accounting and operational requirements.

21. Website & Online Services

When individuals visit the WizeUp Financial Education website, we may collect limited technical information such as IP addresses, browser type, pages visited and the date and time of access.

This information is used to maintain website security, understand website usage and improve our services.

Individuals who subscribe to newsletters, complete contact forms or register for events may provide personal information including their name, email address, organisation and contact details.

This information will only be used for the purpose for which it was collected unless a lawful basis exists for further processing.

Individuals may unsubscribe from marketing communications at any time by contacting office@wizeupfinancialeducation.co.uk.

22. Data Subject Rights Summary

Individual Rights

Under UK GDPR, individuals have the right to:

- Be informed about how their personal data is used.
- Request access to their personal data.
- Request correction of inaccurate personal data.
- Request erasure of personal data where appropriate.
- Request restriction of processing.
- Object to processing in certain circumstances.
- Request transfer of their personal data where applicable.
- Withdraw consent at any time where consent is the lawful basis for processing.

Requests should be submitted to office@wizeupfinancialeducation.co.uk.