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## Privacy Policy

**Policy owner:** Michael Howe – Director of Central Services, Quality & impact

**Policy lead:** Katie Sandys-Renton – Head of Legal Services

**Trustee committee responsible:** Audit & Risk

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**Last updated:** September 2022 – Inclusion of Signpost CIO, payment collection website, no other required changes

**Next Review:** September 2023

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### INTRODUCTION

**One YMCA** ('Charity', 'We', 'Our') supports people across Hertfordshire, Bedfordshire and Buckinghamshire through a range of crucial services across multiple communities.

This Policy covers One YMCA, Early Childhood Partnership, Signpost CIO and subsidiary charities and projects. The Charity is committed to protecting and respecting your privacy.

This Policy sets out the use of the information you give us, why we collect personal information about individuals and how we use that information. It explains the legal basis for this and the rights you have over the way your information is used.

### THE PERSONAL INFORMATION WE COLLECT

The type and amount of information we collect depends on why you are providing it. The Charity operates a wide range of services and the information that you provide will depend upon the services that you require.

The information we collect when you make an enquiry includes your name and details beyond that depend upon the specific services that you are seeking. Please consult any application forms for further information. Please note that different services will require differing levels of information so that we can determine whether the Charity is best placed to help you.

If you are a supporter, for example making a donation, volunteering, registering to fundraise, signing up for an event in addition to asking for your name and contact details (your full address, email address and your phone number), we may also ask you for service specific information that assists the Charity deliver its services and needs of beneficiaries.

If you are a donor, any payment details that you provide will be in the form of:

- Payments via a Just Giving portal and the Charity will not receive credit card details as these are processed securely by Just Giving,
  - Payments via our website where the Charity will receive credit card details and are processed securely using 'Stripe',
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YMCA enables people to develop their full potential in mind, body and spirit. Inspired by, and faithful to, our Christian values, we create supportive, inclusive and energising communities, where young people can truly belong, contribute and thrive.

- Payments via BACS and the Charity will receive bank transaction details.

If you are a service or job applicant, the information you are asked to provide is as set out in the application and necessary for the purposes of our consideration of your application.

If you sign up for an event operated by the Charity, then the information you provide to register your booking will be held by the Charity. However, any payments will be dealt with by the booking portal which is operated securely by a third party and the Charity will not receive credit card details.

#### **HOW WE MAY COLLECT YOUR PERSONAL INFORMATION**

We may collect information from you whenever you contact us or have any involvement with us, for example when you:

- visit our website (see our Cookies policy)
- donate to us or fundraise for us
- enquire about our activities or services
- apply to receive the Charity's services
- apply to receive accommodation from us
- request housing advice and support from us
- enter into a gym contract
- request a fitness class place where you provide fitness information about yourself
- enter into a nursery contract or place your child into our care
- enter into a community centre booking contract
- let or hire space from us
- register for children's or family centre services and/or activities
- participate or visit children's or family centres
- join (or your child joins) a youth club
- sign up to receive news about our activities
- create or update a profile
- post content onto our website/social media sites
- volunteer for us
- attend a meeting with us and provide us with information
- take part in our events
- enter our buildings which are subject to CCTV systems which are present for the prevention of crime, anti-social behaviour and/or good site management or security purposes
- contact us in any way including online email, phone, SMS, social media or post.

#### **WHERE WE MAY COLLECT PERSONAL INFORMATION FROM**

We collect information directly:

- When you ask us for help or apply to access a Charity service
- When you ask us for help or apply to access a commissioned service that we are involved in its delivery
- When you ask us for information or make a donation, volunteer, attend our events contact us for any other reason.

We collect information indirectly:

- When your information is shared with us by other organisations such as local authorities, public sector commissioners, other charities (or not for profit entities), family / parents / guardians who are seeking access for you to our services.
- When your information is shared with us by other organisations such as fundraising sites like Just Giving if you are fundraising for us.
- When your information is shared with us by local authorities where the Charity has been commissioned (directly or indirectly) to provide services on their behalf.

- When you have given other organisations permission to share it: Your information may be provided to us by other organisations if you have given them your permission. This might for example be a charity working with us or might be when you buy a product or take a service from a third-party organisation.
- When you use our website information about you may be recorded and stored. See our cookies policy for more information about this.

Depending on your settings or the privacy policies applying for social media and messaging services you use, like Facebook, Instagram or Twitter, you might give us permission to access information from those accounts.

## HOW WE MAY USE YOUR PERSONAL INFORMATION

We may use your personal information in a number of ways which including:

- When carrying out our obligations under any contract between us
- When necessary for carrying out obligations under any contract where we have been commissioned to deliver services on behalf of a local authority and/or public sector agency
- When providing you with the information or services you have asked for,
- To prove your identity and/or entitlement to use our services
- When working with trusted third-party organisations who work in partnership with us to deliver the services you have requested
- When processing donations you make, including processing for Gift Aid purposes,
- When organising volunteering activity, you have told us you want to be involved in and in relation to the fundraising for us you are involved in
- When sending you communications with your consent that may be of interest including marketing information about our services and activities, campaigns and appeals asking for donations and other fundraising activities and promotions for which we seek support
- When seeking your views on the services or activities we carry on so that we can make improvements
- When processing grant or job applications
- When complying with our auditing requirements
- To enable us to comply with our legal and regulatory obligations

## OUR LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

The use of your information for the purposes set out above is lawful because one or more of the following applies:

- **Consent:** you have given consent for the Charity to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for the Charity to comply with the law.
- **Vital interests:** the processing is necessary to protect someone's life.
- **Public task:** the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- Where processing is necessary for a task carried out in the public interest or in the exercise of official authority vested in the Charity by law or any commissioned service that is being delivered.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party.

## HOW WE KEEP YOUR PERSONAL INFORMATION SAFE

We understand the importance of security of your personal information and take appropriate technical and organisational security measures to safeguard it.

We always ensure only authorised persons have access to your information and everyone who has access is appropriately trained to manage your information.

## WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may transfer, share or disclose the personal data we collect from you to third parties (other organisations or individuals) for:

- The purposes for which the information has been given to us
- The purposes listed above under ‘How we may use your personal information’
- The administration and maintenance of our website(s)
- Other internal or administrative purposes
- Partner charities or organisations who are assisting with the delivery of our services

We also may transfer share or disclose personal data to third party service providers of identity management, website hosting and management, data analysis, data backup, security and storage services.

These third-party providers may use their own third-party subcontractors that have access to personal data (sub-processors). It is our policy to use only third-party providers that are bound to maintain appropriate levels of security and confidentiality, to process personal information only as instructed by us, and to flow those same obligations down to their sub-processors.

### **Other disclosures**

We may also disclose personal information to third parties under the following circumstances:

- When explicitly requested by you
- When required to deliver services requested by you
- When required to facilitate our events that you have asked to attend which are hosted by a third party

We may also disclose your personal information to law enforcement, regulatory and other government agencies and to professional bodies and other third parties, as required by and/or in accordance with applicable law or regulation. This could include disclosing personal details to housing benefit offices, the policy and local authorities etc.

We will share your personal information in relation to the safeguarding individuals which is necessary and in the public interest.

Other than where there is a legal obligation to do so, we will not share your information with other organisations without your consent.

### **International transfers of personal information**

Your personal information may be transferred outside the UK. Any such transfer to outside the EEA will be only be:

- To a recipient located in a country which provides an adequate level of protection for your personal information; or
- Under a contractual agreement which satisfies UK requirements for the transfer of personal data outside the UK

### **CHILDREN'S INFORMATION**

Where appropriate we will ask for consent from a parent or guardian to collect information from children under 13.

In respect of any youth work that is undertaken by the Charity, we will ask for consent from a parent or guardian for a child's participation in youth work activities.

Where you enrol for services in respect of your family and/or your children, the information requested will take into account what is needed to deliver the services that you request and any obligations placed on us by commissioned contracts from local authorities and/or public authorities. In many commissioned services, the Charity is acting on behalf of a local authority who remain as data controller in pursuance of their statutory obligation to facilitate service delivery.

### **SAFEGUARDING**

The Charity takes its obligations very seriously in respect of safeguarding matters. It will follow its legal and best practice duties required by safeguarding law to protect the interests of service users and/or the public in the spirit and objectives of the prevailing legislation.

## **KEEPING YOUR INFORMATION UP TO DATE**

We really appreciate it if you let us know if your contact details change. You can do so by contacting us at [data.protection@oneymca.org](mailto:data.protection@oneymca.org)

## **OUR USE OF “COOKIES”**

Please see our cookies policy, which can be found [here](#).

## **HOW LONG WE KEEP YOUR INFORMATION FOR**

We will hold your personal information for as long as it is necessary for the relevant activity. By way of example, we hold records of donations you make for at least six years so we can fulfil our statutory obligations for tax purposes. Please see our Retention Policy at [www.oneymca.org/data](http://www.oneymca.org/data)

Where we rely on your consent to contact you for direct marketing purposes, we will treat your consent as lasting only for as long as it is reasonable to do so. We may periodically ask you to renew your consent.

If you ask us to stop contacting you with marketing or fundraising materials, we will keep a record of your contact details and limited information needed to ensure we comply with your request.

## **YOUR RIGHTS**

You have certain rights in relation to the personal information we hold about you. In particular, you have the right to:

- Request a copy of personal information we hold about you;
- Ask that we update the personal information we hold about you, or correct such personal information that you think is incorrect or incomplete;
- Ask that we delete personal information that we hold about you, or restrict the way in which we use such personal information;
- Object to our processing of your personal information; and/or
- Withdraw your consent to our processing of your personal information (to the extent such processing is based on consent and consent is the only permissible basis for processing).

If you would like to exercise these rights or understand if these rights apply to you, please contact us (see below how to contact us).

We will not use your personal information for automated decision making or profiling.

## **CHANGES TO THIS PRIVACY POLICY**

This Policy may be changed from time to time. Do please check this Policy each time you consider giving your personal information to us.

## **HOW TO CONTACT US**

If you have any questions about this Policy or concerning your personal information please contact [data.protection@oneymca.org](mailto:data.protection@oneymca.org) or by post to The Data Protection Officer, One YMCA, Charter House, Charter Place, Watford, Hertfordshire WD17 2RT.

If you are not happy with the way in which we have processed or dealt with your information, you can complain to the Information Commissioner's Office. Further details about how to complain can be found at [www.ico.gov.uk](http://www.ico.gov.uk)