

YMCA Trinity group is committed to the security of your data and protecting your privacy.

This privacy policy sets out how YMCA Trinity group (referred to as 'YMCA Trinity', 'our', 'us' or 'we') collects and uses personal information (or data) in compliance with the General Data Protection Regulation (GDPR), and the Data Protection Act 2018.

The Role of YMCA Trinity Group

YMCA Trinity is a data controller under the GDPR. This means YMCA Trinity is responsible for determining how we gather and store personal data relating to individuals (or 'data subjects', as they are called in the GDPR), and the purposes for and manner in which that personal data is processed.

For the purposes of this privacy policy, we define 'personal information' as any information about an individual from which that person is or can be identified. Personal information amounts to 'personal data' for the purposes of and as defined in the GDPR.

Personal information does not include data where the individual's identity has been removed (anonymous data), such as collated statistics from survey responses. You cannot be identified from this data, and we can use it for whatever purpose we choose without further notice to you.

Our Promise to You

Any personal information we hold about you will be:

- Collected and used only for valid purposes, which you will be informed about
- Accurate and up-to-date
- Kept securely (including data stored digitally and in manual filing systems)
- Retained and used only for as long as necessary for the purposes we tell you about

What Data We Collect

YMCA Trinity may collect, store, and use the following categories of personal information:

- Contact details, such as name, title, addresses (or approximate location), telephone numbers, fax number, email addresses

- Emergency contact information - this will be provided by you and stored/used by YMCA Trinity on the understanding that you have informed the individual(s) to whom this data relates

- Date of birth, age
- Gender
- Photographs
- Social media handles
- Website and IP addresses
- Signature

How We Collect Personal Information

You may provide personal data to YMCA Trinity when you:

- Complete a consent form
- Email, write, or text YMCA
- Telephone YMCA, and leave a message
- Take part in a media (radio, newspaper) appearance
- Are in a photograph
- Fill in an evaluation form
- Interact with YMCA via social media
- Subscribe to the YMCA (newsletter) mailing list
- Write a case study or piece for the YMCA newsletter
- Complete a YMCA survey or poll
- Submit an application form to volunteer

To fulfil our obligation to funders, we may need to obtain data via observations. Staff will record interactions with service users, which will be anonymised into case studies.

Our Lawful Basis for Processing Personal Information

We will only use your personal information to the extent that the law allows us to do so. Under the GDPR, we rely on the following legal bases for processing your personal information:

- Sometimes we collect data because it is necessary to comply with a legal obligation we are subject to.
- It may be necessary to protect an individual's vital interests.
- Where you have given us your consent.
- Where it is necessary for the purposes of our legitimate interests (or those of a third party) and your interests or fundamental rights and freedoms do not override those legitimate interests.

Where appropriate, we will seek consent of the holder of parental responsibility for any young person below the age of 16 years old. However, if deemed necessary (e.g. for sake of safeguarding) we may not seek parental consent.

How YMCA Trinity Group Uses Your Personal Information

We will only use your personal information for the purposes that we collect it for.

YMCA Trinity uses data to carry out our objective to provide young people with an appropriate and supportive service, or to help them access one.

Your personal information may be disclosed to any YMCA Trinity employee or volunteer as reasonably necessary for the purposes identified in this policy.

YMCA Trinity also uses data to:

- Arrange and confirm support meetings
- Provide support to other people, e.g. advice to parents/carers and professionals
- Respond to enquiries and complaints
- Promote YMCA Trinity services and activities
- Contact you with relevant information, such as news, events and activities
- Fundraise
- Process payments, including funding and donations
- Thank supporters
- Collate information and assess the impact of YMCA Trinity services

YMCA Trinity and our Third Party Service Providers

YMCA Trinity uses some third-party services to assist in our operations.

These third-party services include:

- Survey Monkey
- Softwerx
- MailChimp
- Google Analytics
- Sage
- Disclosure & Barring Service

YMCA Trinity will still act as a data controller in respect of your personal data. The third party service provider will only process your personal information on our documented instructions.

YMCA Trinity also uses social media to interact with individuals (such as Twitter, Facebook and Instagram). Any personal information shared through those sites is subject to the service provider's privacy policy, and we recommend you read the relevant policy before posting online.

Data Sharing with other Third Parties

YMCA Trinity may on occasion need to share your data with other third parties. This will only be done where necessary, and you will be notified.

As with YMCA Trinity, these third parties are required to respect the security of your data. We only permit them to process your personal information for specified purposes and they must treat it in accordance with GDPR, the applicable law, and YMCA Trinity policies.

Examples of third parties YMCA Trinity works with in partnership or hold contracts with include:

- Suffolk County Council
- Outreach Youth
- Schools

We may also disclose personal information to third parties if we are under a duty to do so in order to comply with any legal obligation, or in order to enforce or apply any of our agreements, or to protect the rights, property or safety of YMCA Trinity, our staff, or others.

YMCA Trinity may share statistical data with third parties, but this will be anonymous and individuals will not be identified.

We will not, without your consent, supply your personal information to third parties for the purpose of direct marketing.

Data Security

YMCA Trinity uses a range of measures to protect the security of your information and prevent unauthorised access, loss, misuse or inappropriate alteration of your data.

We have put in place reasonable physical, electronic and managerial procedures to safeguard and secure personal information. For example, we use:

- Encryption – including portable devices and encrypted emails
- Locked cabinets
- Strong passwords
- Password protected servers, accounts/log-ins, databases, documents, and programmes (e.g. Microsoft Outlook)
- Restricted areas of server accessible only by authorised personnel
- Up-to-date virus protection, firewalls, and malware software

YMCA Trinity limits access to your personal information to only the necessary employees and volunteers who need to know.

We have procedures to deal with a suspected data security breach, which may include notifying you and the Information Commissioner's Office where we are legally required to do so.

Data Retention

We will retain your personal information (including printed and electronic documents) for only as long as necessary to fulfil the purposes for which we collected it, and to fulfill legal, accounting, employment, and reporting requirements.

Different types of data may be retained for different periods, as outlined in the YMCA Trinity Retention Policy.

Your personal data stored by YMCA Trinity will be destroyed or deleted at the point retention expires.

Updating Information

YMCA Trinity has a duty to keep all the information we hold about you up-to-date in line with any amendments you tell us of.

As such, please keep us informed of any changes to your personal information by contacting us in one of the ways described under Your Rights, below.

Your Rights

The GDPR gives you greater control over your personal information.

You may exercise your rights, in writing by addressing your request to the Data Protection Officer, by:

- Emailing admin@ymcatrinity.org.uk
- Writing to, or dropping in at, YMCA 2 Wellington Street, Ipswich, IP1 2NU
- Calling 01473 252456

As an additional, appropriate security measure, we may need to see identification or other information to confirm who you are. This will clarify your right to access the data and exercise your rights, and avoid incorrect disclosures. Valid forms of identification may include a passport, driving licence or birth certificate.

YMCA Trinity will usually respond to your request within one calendar month. Normally, no fee will be charged unless we consider that the request is excessive.

If we are unable to fulfill your request (for example, because of a conflicting legal obligation), or need to take longer to process your request, we will explain why.

Under the GDPR, in certain circumstances you have the following rights:

1. Correction

If you consider the personal information we hold about you to be inaccurate or incomplete, you can request for us to correct it.

2. Restriction

If you have any concerns about the way YMCA Trinity may be using your data, you may request for us to suspend its use while these concerns are investigated. This is known as 'restriction'. Concerns you may have could include:

- Inaccuracies in the data
- Our reason(s) for processing the data
- Preventing erasure of your information, so that it may be available beyond the time frame established in the YMCA Trinity Retention Policy (available upon request)

You should note that restricted data remains stored (but not erased) and may be restricted only for a limited time period.

3.Objection

You may have the right to prevent YMCA Trinity using your personal data where your particular situation means you object to it being processed. In this case, we may require specific reasons.

We cannot request reasons for your objection to direct marketing. This includes contacting you about fundraising.

This data may still be stored, and not erased.

4.Erasure

As part of your 'right to be forgotten', you may ask YMCA Trinity to delete or remove your personal information from our database where:

- there is no acceptable reason for us to continue processing or to store it
- you withdraw your consent to the processing
- you have exercised your right to object (see above).

5.Transfer (or Data Portability)

This right allows you to request us to move, copy, or transfer your personal data from the YMCA Trinity IT network to yourself or another network, service, business, etc. We will do so without compromising security or the data usability.

This excludes information stored on paper-based files.

Right to Withdraw Consent

Occasionally, we may obtain your consent to collect and process your personal data for a specific purpose.

You have the right to withdraw your consent at any time by contacting the YMCA.

After YMCA Trinity receives notification that you have withdrawn consent, we will no longer process your information for the stated purpose(s). There may be exceptions where we have another legitimate, lawful basis for doing so, which we will inform you of.

Report a Concern

If you have a concern about the way your personal information has been handled, please do contact us to talk about it. Alternatively, complaints can be reported directly to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at:

- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- 0303 123 1113

Further information, including live chat help, is available online at <https://ico.org.uk/concerns>

Changes to this Privacy Policy

YMCA Trinity reserves the right to update and amend this privacy policy at any time.

The correct version will be accessible on the YMCA Youth website at any time. Copies may also be requested from YMCA Trinity Group at:

- admin@ymcatrinity.org.uk
- 01473 252456
- YMCA Trinity Group, 2 Wellington Street, Ipswich, IP1 2NU