



## PRIVACY POLICY

### WHO WE ARE

This policy sets out how The Northamptonshire Association of Youth Clubs ('NAYC') and Action Centres UK ('ACUK') treat your personal data, including why we collect it, what kind of personal data we collect, when we collect it, how your personal data will be used, protected and stored, and your rights in respect of that personal data.

When we process the personal data of a child under the age of 13 we require that any necessary consents are provided on behalf of the child by a parent or person with parental responsibility for that child. We require that, where appropriate, a parent or person with parental responsibility for such a child explains the effect of this privacy notice to the child.

When we use the term 'personal data' we mean information that relates to you and allows us to identify you, either directly or indirectly.

### WHY DO WE COLLECT PERSONAL DATA?

We only collect personal data that is necessary to provide or improve the services offered by NAYC & ACUK.

We will only use your personal data to the extent that the law allows us to do so. In certain circumstances our justification for processing your personal data will be that you have provided consent (or a parent or person with parental responsibility for a child has consented on a child's behalf) to our processing of personal data. Where we have not obtained consent we may consider that processing your personal data is necessary for our legitimate interests (those interests will tend to be the interests of our organisations in providing services) and your or your child's interests or fundamental rights and freedoms do not override our legitimate interests. Alternatively, we may have a legal obligation to process your personal data.

Where we require your consent to process personal data and you do not give consent we may be unable to provide you with the services you have requested. Please note, in such circumstances, you will not be entitled to cancel or obtain a refund of any price you have paid.

### WHAT PERSONAL DATA DO WE COLLECT AND WHEN DO WE COLLECT IT?

The personal data we collect depends on how you interact with us but is generally as follows:

- When you make an enquiry or request information on the phone or through the website:

Your name, e-mail address and phone number will be recorded.

- When you make a booking with us through our third party provider, Venue 360:

Your name, phone number, age, dietary requirements, gender and payment details will be recorded.

We may also take details of your interactions with us by phone and e-mail in order to ensure a smooth booking process.

- When you visit a centre:

Images will be taken by CCTV cameras around our sites to keep our guests safe.

If consent has been given, our designated photographer may take photos or videos of your group.

- When you apply for a job with us:

We will collect details for the purpose of processing applications for roles with us, such as our Firm Foundations Instructor Training Scheme, and for managing the relationship between us. These details may include an applicant's name, address, date of birth, religious beliefs, medical history and criminal record.

- When you visit our website:

In addition to recording information about you when you make an enquiry via our website, cookies may be collected when you access our website. For more information on cookies see the section below.

### SENSITIVE PERSONAL DATA

You may also need to supply us with special categories of personal data ('sensitive personal data') pertaining to your racial or ethnic origin of the individual, your religious or philosophical beliefs, or your physical or mental health. We only collect this information when absolutely necessary, such as to carry out our legal obligations in relation to employees and volunteers.

### HOW LONG DO WE STORE PERSONAL DATA?

We will only retain your personal data for as long as is necessary for the purposes for which we are processing it.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

### HOW DO WE USE YOUR PERSONAL DATA?

- To manage your booking or use of our services.
- To provide a quote or respond to an enquiry.
- To send you marketing communications. We will send you marketing communications that we feel may be of interest to you. We will ask for your consent to send such communications to you at the time we collect that personal data and we will offer you the chance to opt out each time we communicate with you.
- To personalise your customer experience and improve your experience of our services.
- To fulfil our legal responsibilities. We will collect, store and, in some cases, pass on personal data for legal reasons, including reporting accidents, incidents and safeguarding concerns.

### HOW DO WE PROTECT YOUR PERSONAL DATA?

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### WHO IS YOUR PERSONAL DATA SHARED WITH?

NAYC & ACUK does not share your personal data with third parties unless this is needed to fulfil our legal or contractual obligations, to provide services to you or for the purposes of providing marketing communications to you as you have requested.

Our website uses third party embedded content from providers such as Instagram and YouTube and has links to other sites. Those third parties have their own privacy policies and cookies policy. We do not have any responsibility for how third parties treat your personal data.

In the event of an emergency, personal data may be shared with emergency services. For example, if someone is taken ill at one of our sites, their medical information may be shared to ensure they receive appropriate treatment.

We will share personal data with email providers and service providers. This may include transferring your personal data outside of the European Economic Area (the 'EEA'). If personal data is to be transferred outside of the EEA we will ensure that appropriate safeguards are in place to ensure your personal data is adequately protected. For further details of the appropriate safeguards we will put in place please contact us using the details below.

### WHAT ARE YOUR RIGHTS?

As an individual whose personal data is processed by NAYC & ACUK, you have the following rights:

- To access the personal data we hold about you.
- To have errors or inaccuracies in your personal data corrected.
- To have your personal data transferred to another organisation.
- In certain circumstances, to have your personal data erased.
- In certain circumstances, to have the processing of your personal data restricted.

- In certain circumstances, to object to certain types of processing.
- Where we are relying on consent to process your personal data, you have the right to withdraw that consent at any time.
- You have the right to lodge a complaint about how we process your personal data with a supervisory authority. Before you do so we ask that you contact us in the first instance so that we can try and resolve your complaint.

#### WHAT HAPPENS IF WE UPDATE OUR PRIVACY POLICY?

Any changes made to our privacy policy will be posted on this page.

#### COOKIES

A cookie is a small piece of code that allow us to identify the computer or device you are using to access a website. When you load the website you will be given the option to accept cookies. You are also able to turn off cookies in your web browser. Cookies are designed to improve the user experience of our website by showing you content that we think you will find interesting, allowing easier navigation across the website and collecting analytics in order to help us improve our site. Certain parts of the website will not work correctly if cookies are not enabled.

#### CONTACT

If you have any questions about this policy, you would like to exercise any of your rights stated above or if you wish to make a complaint, please contact Karen Anderson, Data Controller, NAYC-ACUK, Head Office, Kings Park, Kings Park Road, Northampton, Northamptonshire, NN3 6LL.