

ALFORD HOUSE
DATA PROTECTION STATEMENT

INTRODUCTION

A copy of Alford House's new Data Protection Statement is below for you to read. This replaces the existing statement you may already have signed up to.

Alford House respects your privacy and is committed to protecting your personal data. Your personal data is data which by itself or with other data available to us can be used to identify you. It does not include data where the identity has been removed (anonymous data). This privacy statement will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

We have provided a Glossary at the end of this privacy statement to help you understand the meaning of some of the terms used in this privacy statement.

We have made this privacy statement available to download as a pdf version on our website (alfordhouse.org.uk) if you wish.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this privacy statement

This privacy statement aims to give you information on how Alford House collects and processes your personal data whether through your use of our Website (alfordhouse.org.uk) or otherwise.

It is important that you read this privacy statement together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy statement supplements the other notices and is not intended to override them.

Controller

Alford House is the controller and responsible for your personal data. Alford House may be referred to in this privacy statement as "the Club", "we", "us" or "our".

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy statement. If you have any questions about this privacy statement, including any requests to exercise your legal rights, or have any difficulty understanding any part of this privacy statement or what it means for you, please contact the data privacy manager using the details set out below.

Contact details

Full name of legal entity: Alford House

Name or title of data privacy manager: Tim Saunders

Email address: tim@alfordhouse.org.uk

Postal address: Alford House, Aveline Street, London, SE11 5DQ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy statement and your duty to inform us of changes

We keep this privacy statement under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

If you visit our Website, you should note that the website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE DATA WE COLLECT ABOUT YOU

We may collect through our offline registration and membership application process, use, store and transfer, different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes title, first name, maiden name, last name, marital status, title, date of birth and gender.
- **Contact Data** includes home address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments from our members and donors.
- **Education information** includes the name of your school, college or other educational establishment.
- **Communications Data** includes your communication preferences (how you would like us to contact you).
- **Special Categories of Personal Data** includes details relating to our members' health (in case you have an existing condition of which we should be made aware), race or ethnicity.

We may also collect via our Website, use, store and transfer:

- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our Website.
- **Usage Data** includes information about how you use our Website.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data (see above) to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy statement.

By the nature of our activities as a youth club, children may visit our Website to find out more about us, and we may collect children's Technical Data and Usage Data for our own internal purposes. All other collection of children's data is undertaken offline via our registration and membership application process and inputted into our systems. We do not market to children, we do not profile children and our systems do not make automated decisions about children. We safeguard the data we hold about children and treat it with utmost care and attention.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of an agreement we have with you and you fail to provide that data when requested, we may not be able to provide our youth club services to you and we may have to withdraw your access to our facilities.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity Data and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - sign up for membership via our offline registration and membership application process;
 - enter a survey; or
 - give us some feedback.
- **Automated technologies or interactions.** As and when you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our Cookie Policy on our Website for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources including Technical Data from the following parties:

- (a) analytics providers such as Google based outside the EU; and
- (b) search information providers such as Google, Yahoo, Microsoft Edge, Bing and DuckDuckGo based inside or outside the EU.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the services you have asked us to provide to you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You can find out more about the types of lawful basis that we will rely on to process your personal data by looking at the Glossary.

We rely on consent as a legal basis for collecting and processing children’s data whether Special Categories of Data or otherwise via our offline registration and membership application process.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please see ‘How is your personal data collected’ above if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member of the Club	(a) Identity (b) Contact (c) Education	Performance of a contract with you
To process your donation including	(a) Identity (b) Contact (c) Financial (d) Transaction	Necessary for our legitimate interests (to raise funds so we can stay operational and provide our services)
To manage our relationship with you which will include: (a) Notifying you about	(a) Identity (b) Contact (c) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation

changes to our terms or privacy statement (b) Asking you to take a survey or provide us with feedback about our services as a youth club		(c) Necessary for our legitimate interests (to keep our records updated and to study how young people use our services)
To enable you to complete a survey	(a) Identity (b) Contact (c) Usage (d) Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how young people use our services, to develop them and expand our offering)
To administer and protect our business and our Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our Website, our activities and services, and our relationships with, and online experiences of, our key stakeholders	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of users of our services, to keep our Website updated and relevant and to develop our services)

Cookies

If you are accessing our Website, you can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our Website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookie Policy on our Website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- External Third Parties as referred to in the Glossary.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

INTERNATIONAL TRANSFERS

Some of our External Third Parties are based outside the European Economic Area (**EEA**) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

DATA SECURITY

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. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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.

DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

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 requirements.

By law we have to keep certain basic information about our members and donors (including Contact, Identity, Financial and Transaction Data) for a number of years for tax purposes.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You can find out more about these rights below.

If you wish to exercise any of the above rights, please contact our data protection manager whose details are set out above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities is set out above.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in and outside the EEA who provide IT and internet hosting and cloud storage services, accounting software services, and member registration and monitoring services.
- Professional advisers including lawyers, bankers, auditors, accountants and insurers based in the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom.

YOUR LEGAL RIGHTS

You have the right to:

- A. **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- B. **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- C. **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- D. **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- E. **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- F. **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- G. **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.