Lydney Hub is a charity (No: 1187543). Our primary goal is to provide a home for Lydney Youth Hub, where the needs of the young people are met, somewhere safe and secure, to tackle the complex personal and social issues facing young people in our area. Lydney Hub promotes innovation, creativity and positivity that supports the growth of the young people and extends this encouragement to the wider community.

This privacy notice provides you with details of how we collect and process your personal data through your use of our site Lydney Hub.

Lydney Hub [is/am/are] the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

**Contact Details**

Lydney Hub

Units 2 & 3,

71 Newerne Street,

Lydney,

GL15 5RA

Lydneyhub@gmail.com

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at **lydneyhub@gmail.com**

**We believe strongly that everyone involved with Lydney Hub/ Lydney Youth Hub has a right to privacy.**

**This Privacy Notice is to explain how we collect, store, and handle your personal data.**

1. **Why we collect your data**

Personal data means any information capable of identifying an individual. It does not include anonymised data.

We may process the following categories of personal data about you:

* **Communication Data** that includes any communication that you send to us whether that be through the contact form on our website, via email, text, social media messaging, social media posting or any other communication that you send us.

We will also collect children’s, parent’s, staff, and volunteers’ data in order to:

* + - Contact them in an emergency.
		- Ensure awareness of any allergies, special educational needs or disabilities, or any other medical conditions requiring relevant adjustments to be made.
		- Inform about activities, events, and other Lydney Youth Hub related matters.

We process this data for the purposes of health and safety, communicating, record keeping and establishment, pursuance or defence of legal claims. Our lawful ground for this processing is our legitimate interests which in this case are to reply to communications sent to us, to keep records and to establish, pursue or defend legal claims.

* **User Data** that includes data about how you use our website and any online services together with any data that you post for publication on our website or through other online services. We process this data to operate our website and ensure relevant content is provided to you, to ensure the security of our website, to maintain back- ups of our website and/or databases and to enable publication and administration of our website, other online services and business. Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business.
* **Technical Data** that includes data about your use of our website and online services such as your IP address, your login data, details about your browser, length of visit to pages on our website, page views and navigation paths, details about the number of times you use our website, time zone settings and other technology on the devices you use to access our website. The source of this data is from our analytics tracking system. We process this data to analyse your use of our website and other online services, to administer and protect our business and website, to deliver relevant website content and advertisements to you and to understand the effectiveness of our advertising.  Our lawful ground for this processing is our legitimate interests which in this case are to enable us to properly administer our website and our business and to grow our business and to decide our marketing strategy.
* **Marketing Data** that includes data about your preferences in receiving marketing from us and our third parties and your communication preferences. We process this data to enable you to partake in our promotions such as competitions, prize draws and free give-aways, to deliver relevant website content and advertisements to you and measure or understand the effectiveness of this advertising.  Our lawful ground for this processing is our legitimate interests which in this case are to study how customers use our products/services, to develop them, to grow our business and to decide our marketing strategy.
* **Sensitive Data**
	1. We will from time to time, collect data on race and ethnicity in order ensure we are delivering an effective and diverse service.
	2. We require your explicit consent for processing sensitive data, so when you submit your details, we will send you a further communication asking for you to confirm your consent to this processing.
	3. We will only use your personal data for a purpose it was collected for or a reasonably compatible purpose if necessary. For more information on this please email us at**Lydneyhub@gmail.com**
	4. In case we need to use your details for an unrelated new purpose we will let you know and explain the legal grounds for processing.
	5. We may process your personal data without your knowledge or consent where this is required or permitted by law.
	6. We do not carry out automated decision making or any type of automated profiling.
1. **How we collect your data**
	1. We may data about you by you providing the data directly to us i.e. membership forms for both youth members and adults or by sending us emails.
	2. We may automatically collect certain data from you as you use our website by using cookies and similar technologies. Please see our cookie policy for more details about this.
	3. We may receive data from third parties such as analytics providers such as Google based outside the EU, advertising networks such as Facebook based outside the EU, such as search information providers such as Google based outside the EU, providers of technical, payment and delivery services, such as data brokers or aggregators.
	4. We may also receive data from publicly availably sources such as Companies House and the Electoral Register based inside the EU.
	5. We treat your data with the utmost care and take appropriate steps to protect it.
	6. We do not share your data outside of Lydney Youth Hub, without your permission
		1. See Lydney Hub/ Lydney Youth Hubs GDPR consent form regarding contacting and publishing of details.
		2. In line with the GDPR consent form, we may place images of members, staff, volunteers, and parents/carers, as well as information pertaining to your involvement in Lydney Hub/ Lydney Youth Hub on the Lydney Hub/ Lydney Youth Hub website, social media (Facebook, Twitter, Instagram), and on publicity noticeboards.
2. **Your rights**
	1. You have many rights concerning your data including seeing what data we hold.
	2. You have a right to update your information at any time.
	3. You have a right to ask us to delete your information at any time.
	4. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.
	5. To protect the confidentiality of your data, we will ask you to verify your identify before proceeding with any request you make under the privacy policy.
	6. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act.
3. **Storage and protection of your personal data**
	1. We have put in place security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, or accessed without authorisation.
	2. We also allow access to your personal data only to those employees and partners who have a business need to know such data. They will only process your personal data on our instructions, and they must keep it confidential.
	3. We have procedures in place to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach if we are legally required to.
	4. Members and their associated records are held securely by the Youth Leader in a paper file when off site, as well as in a file held securely in the Youth hub office.
	5. Despite our best efforts to protect your personal information, the security of your information sent over the internet cannot be guaranteed and may be illegally intercepted or changed after it has been sent. Lydney Hub/ Lydney Youth Hub cannot accept liability for these if this happens.
4. **Deletion of personal data**
	1. Personal data is held until such time that we are notified of a member’s, staff, or volunteer’s resignation, or in the instance of youth members non-attendance and non-communication for a period of six months, we will automatically remove members data and associated records, apart from accident and health and safety records which will be held for seven years.
	2. We will also delete member’s data at their request as soon as we are able to do so and not exceeding one week of the request being made.
5. **Legal basis**

Under data protection laws you have rights in relation to your personal data that include the right to request access, correction, erasure, restriction, transfer, to object to processing, to portability of data and (where the lawful ground of processing is consent) to withdraw consent.

You can see more about these rights at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection->regulation-gdpr/individual-rights/

If you wish to exercise any of the rights set out above, please email us at **Lydneyhub@gmail.com**

* 1. The law on data protection sets out several different reasons for which an organisation may collect and process your personal data, including:
		1. **Consent** – in specific situations, we can collect and process your data with your consent. When collecting your personal data, we’ll always make clear to you which data is necessary in connection with a particular service.
		2. **Legal Compliance** – If the law requires us to, we may need to process your data according to the law e.g.: safeguarding.
		3. **Legitimate Interest** – with your permission we will use your data to contact you about relevant events, activities, and matters pertaining to Lydney Hub/ Lydney Youth Hub that we think may interest you.
1. **Disclosures of personal data**

We may have to share your personal data with the parties set out below:

1. Other companies in our group who provide services to us.
2. Service providers who provide IT and system administration services.
3. Professional advisers including lawyers, bankers, auditors and insurers
4. Government bodies that require us to report processing activities.
5. We require all third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.
6. **International transfers**

 We do not transfer your personal data outside the European Economic Area (**EEA**).

We are subject to the provisions of the General Data Protection Regulations that protect your personal data. Where we transfer your data to third parties outside of the EEA, we will ensure that certain safeguards are in place to ensure a similar degree of security for your personal data. As such:

* We may transfer your personal data to countries that the European Commission have approved as providing an adequate level of protection for personal data by; or
* If we use US-based providers that are part of EU-US Privacy Shield, we may transfer data to them, as they have equivalent safeguards in place; or
* Where we use certain service providers who are established outside of the EEA, we may use specific contracts or codes of conduct or certification mechanisms approved by the European Commission which give personal data the same protection it has in Europe.

If none of the above safeguards is available, we may request your explicit consent to the specific transfer. You will have the right to withdraw this consent at any time.

1. **SAR’s Subject Access Requests**
	1. If you would like more details or copies of your personal information, please complete a SAR form, and return it to our Data Protection Officer.
	2. We will acknowledge receipt within seven days and aim to respond within thirty days.
	3. If you have a complaint about any aspect of our DP policy, please let us know and we will aim to respond and resolve the matter within 10 working days.
	4. 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.
	5. If you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([*www.ico.org.uk*](http://www.ico.org.uk/)). We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.
2. **Third party links**

This 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.

1. **Cookies**

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 this website may become inaccessible or not function properly. For more information about the cookies we use, please see Cookie Policy.

**Signed by the board of trustees:**

|  |  |  |
| --- | --- | --- |
|  | **Name** | **Signature** |
| **Trustee 1** |  |  |
| **Trustee 2** |  |  |
| **Trustee 3** |  |  |
| **Trustee 4** |  |  |
| **Trustee 5** |  |  |
| **Trustee 6** |  |  |
| **Trustee 7** |  |  |
| **Trustee 8** |  |  |
| **Trustee 9** |  |  |
| **Trustee 10** |  |  |

Next Review date: June 2023

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| **Document Version History** | **Author:** Emily Timmins, Chair & Youth lead |
| **Version** | **Date** | **Amendments**  | **By Whom** |
| **2** | 05/07/2022 | Added information about how Lydney Youth Hub membership form data is collected, used and stored. | Emily Timmins, Chair & youth lead. |
| **3** | 22/09/2022 | Changed length of time personal data is held from 6 weeks to 6 months. | Emily Timmins, Chair & Youth Lead |