

Data Privacy Notice

Department: Core Services

Approval Route: Board

Frequency of Revision: 2 years

Version	Date Approved	Reason for Update
1	18.12.25	New document to strengthen data privacy.

Table of Contents

Introduction
How do we collect personal information about you?
What personal Information do we use?
How and why will we use your personal information?
Lawful bases
Communications for Marketing and fundraising
Donations
Children’s personal information
How long will we keep your personal Information
Will we share your personal information
International Data Transfers
Your Rights
Changes to this Notice
How to Contact us

Introduction

YMCA Derbyshire (UK Registered Charity Number 1049904 and Company Number 03061837) is committed to protecting your personal data. At all times, we aim to respect any personal information you share with us or that we receive from other organisations and keep it safe. This privacy notice sets out our data processing practices and your rights and options regarding the way in which your personal information is collected and used.

In order to carry out the services we deliver, YMCA Derbyshire may need to use your personal information. Where we do so, we are the controller of your personal information and therefore have certain obligations under data privacy law relating to how we use your personal information. One of those obligations is to let you know how and why we use your personal information, and your related rights and options. This is the purpose of this notice.

If you need to contact us regarding this policy or to exercise any of the rights detailed within this policy please contact our data protection officer:

Theo.vesey@ymcaderbyshire.org.uk

How do we collect personal information about you?

We will need to use your personal information in order that we might properly deliver the correct service to you. We collect personal data from you in the following ways:

When you give it to us directly

For example, personal information that you submit through our website by making a donation or applying to work as a volunteer, or personal information that you give to us when you communicate with us by email, phone or letter in relation to the services that we provide.

When we obtain it indirectly from a third party

Your personal information may be shared with us by third parties with whom we are working, for example, fundraising platforms or organisations running events of which we are a part of. We will only receive your personal information where it is lawful to do so. You may opt out at any point by contacting our governance and compliance manager, and Data Protection Officer, at theo.vesey@ymcaderbyshire.org.uk.

When your personal information is available publicly

Your personal data may be available to us from external publicly available sources. For example, depending on your privacy settings on social media, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as Facebook, Instagram, or LinkedIn).

When you visit our website



When you visit our website, we automatically collect information about your visit, including the uniform resource locator (URL) clickstream to, through and from the website (including date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, referral sources, page interaction information (such as scrolling and clicks) and methods used to browse away from the page.

We also use cookies (small text files) to monitor browsing preferences in order to make a user's experience more efficient and to provide us with the basic visitor statistics for analysis. For more information about cookies used on our website, visit our [Cookie Policy Privacy & Cookie Policy | YMCAD | Supporting People in Derby](#).

What Personal Information do we use?

Personal data is any information relating to an identified or identifiable individual (defined as a 'data subject' under the data protection legislation). This includes information which would identify the individuals if linked to other information we hold.

In the context of YMCA Derbyshire this would include, for example, the names, addresses, and other information relating to employees, trustees, volunteers, supporters, service users, anyone who correspond with us, applicants for housing, education or our family services, residents, students, donors, information about named individuals contained in our files, computer systems or other records, etc.

We may collect, store, and otherwise process the following kinds of personal information: Social Media identity, bank accounts or credit card details where required, in relation to fundraising, employer details for processing a payroll gift and taxpayer status for claiming gift aid, National Insurance number, marital status, personal descriptions and photographs, details of qualification/experience, immigration/emigration information, information about our services/work which you use/which we consider may be of interest to you.

We do not use cookies to collect this type of information. We may also collect and process information about your interactions with us, including details about our contacts with you through email, SMS, post, on the phone or in person. This might include the date, time, and method of contact, details about donations you make to us, events or activities that you register for or attend or any request for support. We may also collect and record other relevant information you share with us about yourself, such as your interests or your affiliations with other charities, including local YMCAs, community or campaign groups.

Do we process Special Categories of Data?

The UK General Data Protection Regulation ("GDPR") recognises that there are sensitive categories of personal information which require more protection, such as health information, information about your racial or ethnic origin, or information about your religious or similar beliefs. In certain situations, YMCA may need to collect and/or use these special categories of personal information (for example, we may need to know your

health information when you agree for your YMCA story to be published on our website; or we may need to know other health information to make reasonable adjustments for).

We will only use such special categories of your personal information where there is a clear need and valid reason to do so and where the GDPR (or other applicable data privacy law in the UK) allows us to do so. Before we collect any special categories of your personal information, we will make it clear what information we are collecting and the purpose we are collecting it for.

How and why we will use your personal information?

We may use your personal information for the following purposes:

- To provide you with a service, product or information you have requested
- To provide services to our beneficiaries;
- To provide further information about our work, services, activities or products (Where necessary, only where you have provided your consent to receive such information);
- To process your donations
- To answer your questions or requests, or to communicate with you more generally;
- To manage relationships with our supporters or beneficiaries
- To further our charitable aims in general, including for fundraising activities;
- To analyse and improve our work, services, activities, products or information, or for our internal records
- To report on the effectiveness of our work
- To run/administer our website, keep it safe and secure and ensure that content is presented in an effective manner for you and your device
- To direct you to key YMCA Derbyshire locations
- To register and administer your participation in events
- To process your application for a job or a volunteer role with us
- To administer your employment/other working relationships with us
- For pension administration purposes if you have a pension associated with current or past employment with us
- For training and or quality control
- To audit/administer our accounts
- To satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/or law enforcement bodies with whom we may work
- For the prevention of fraud or misuse of services;
- For the establishment, defence and enforcement of legal claims

Lawful Basis

UK GDPR requires us to rely on one or more lawful bases to use your personal information. This means we will only process your data where one of the following lawful bases applies:

- The individual has given their explicit consent for us to process their personal data;

- Where necessary so that we can comply with a legal obligation to which we are subject under employment, social security or social protection law (for example, where we are obliged to share your personal information with regulatory bodies which govern our work and services);
- Where necessary, for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract (for example, if you apply for/volunteer with us.
- The personal data is necessary in order to protect the vital interests of the individual. This only applies for matters of life and death. For example, the disclosure of an individual's medical history to a casualty department treating them;
- The processing relates to personal data that has manifestly been made public by the individual;
- The personal data is required to establish, exercise or defend legal claims. For example, the Association needs to refer to or rely on personal data in order to defend an action raised against the organisation in court;
- The processing of the personal data is necessary for reasons of substantial public interest under law. For example, to prevent or detect unlawful acts by disclosing personal data to the police; or
- The processing of the personal data is necessary for health or social care purposes. For example, to assess the working capacity of an employee or provide social care.
- Where there is a legitimate interest in us doing so.

The GDPR allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights).

In broad terms. Our "legitimate interests" means the interests of running YMCA Derbyshire as a charitable entity and pursuing our aims and ideals; for example supporting individuals, processing donations, administering events and taking applications for volunteers.

When we process your personal information to achieve such legitimate aims, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

The association takes particular care when processing and storing special categories of personal data to ensure that it is held securely. Lots of the information held by the Association about residents, learners and children comprises special categories of personal

data. These records are held securely and access is restricted to those who need to see the records.

Communications for Marketing/Fundraising

We may use your contact details to provide you with information about our work, events, services and/or other products that we consider may be of interest to you (for example, about fundraising appeals to which you previously contributed, or volunteering opportunities similar to those you have helped with previously). Where we do this via email or SMS, we will not do so without your prior consent (unless allowed to do so via applicable law).

Where you have provided us with your consent previously but do not wish to be contacted by us about our products and/or services in the future, you can opt out by sending an email to marketing at YMCA Derbyshire, or to our Governance and Compliance manager.

Children's personal information

When we process children's personal information, where required by law we will not do so without their consent or, where required, the consent of a parent/ guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

We remove personal data from our systems in line with our IT, DATA Security and Data Retention Policy. The length of time each category of data will be retained will vary on how long we need to process it, the reason it is collected, and in line with any statutory requirements.

After this point, the data will either be deleted or rendered anonymous. Where we believe data might be relevant to a future safeguarding enquiry we reserve the right to retain data securely for up to 50 years to comply with our insurance and safeguarding guidance.

Will we share your personal information?

We do not share your personal information to third parties for marketing or other purposes. However, sometimes we may need to share your personal information to selected third parties with whom we work, where we may lawfully do so.

We may analyse donor information with other data sources. This and other sharing and analysis will only be conducted where we may lawfully do so without consent. Should data protection legislation require us to obtain consent for any data sharing activity, we may seek to obtain that consent prior to sharing.

Parties we may share data with include, but are not limited to, the following:

- YMCA branches, shops, or nurseries, where the service, product or information you have requested requires it;
- Healthcare professionals and organisations involved in the provision of care, facilities and/or supplies.

- Suppliers and sub-contractors for the performance of any contract we enter into with them, for example, IT service providers such as website hosts or cloud storage providers;
- Parties administering our benefit payments, reward programmes and pensions contributions;
- Professional service providers such as accountants and lawyers;
- Parties assisting us with research to monitor the impact/effectiveness of our work and services
- External fundraising entities/platforms; and/or;
- Organisations that help us run YMCA events or events where YMCA is present/which raise funds for YMCA.
- If substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- If we are under a legal or regulatory duty to do so;
- To protect your rights, property or safety of YMCA, its personal, users, visitors and others.

Where required, we enter into a written contractual agreement that will ensure that those organisations can only use the data provided for the specific purposes we direct them to do, and that they have in place strict security requirements in order to protect your personal information and comply with GDPR.

Security/ storage of and access to your personal information

YMCA is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organizational and technical measures in place to help protect your personal information. For more information, please see our Data Privacy Policy.

International Data Transfers

We will rarely transfer information to companies or organizations outside of the UK, as we recognize that many countries do not have data protection laws which offer as much protection as in the United Kingdom. Where we do, we will, where required, take reasonable steps to ensure that any receipt of your personal information based outside the UK implements appropriate safeguards to protect your personal information.

Exercising your Rights

Where we rely on your consent to use your personal information, you have the right to withdraw consent at any time. This includes the right to ask us to stop using your personal information for marketing or fundraising purposes or to unsubscribe from our email list at any time. You also have the following rights:

- **Right of Access** – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information

requested, and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.

- **Right of Erasure** – at your request, we will delete your personal information from our records in so far as we are required to do so. In many cases, we would propose to suppress further communications with you where possible, rather than delete them.
- **Right of rectification** – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.
- **Right to Restrict Processing** – you have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate use.
- **Right to object** – you have the right to object to processing where we are i) processing your personal information on the basis of the legitimate interest grounds, ii) using your personal information for direct marketing, or iii) using your personal information for statistical purposes.
- **Right to data portability** – to the extent required by GDPR, where we are processing your personal information (that you have provided to us) either i) relying by your consent or ii) because such processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract, and in either case, we are processing using automated means (ie with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.
- **Rights related to automated decision making** – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal, or similarly significant, effects on you, unless such a decision i) is necessary to enter into/perform a contract between you and us/another organization; ii) is authorized by UK law to which YMCA is subject (as long as that law offers you sufficient protection), or iii) is based on your explicit consent.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. Please note that

some of these rights only apply in limited circumstances. For more information, we suggest that you contact us using the details below.

You are entitled to make a complaint about the way we have processed your data. Should you wish to make a complaint, we strongly encourage you to go through our complaints process, as identified in our complaints policy which can be found on our website. Briefly, individuals should follow the Stage One process by either submitting a written complaint by handing this to reception or sending it to the Data Protection Officer (this could be a letter or a completed Stage 1 Complaints form), or emailing your complaint to complaints@ymcaderbyshire.org.uk.

More information on how we deal with your data protection complaints can be found in the complaints policy. Should you remain dissatisfied about the way we have processed your personal information, you are entitled to make a complaint to the Data Protection regulatory authority in the UK, the Information Commissioner's Office www.ico.org.uk.

Changes to this notice

We may update this Notice from time to time. We will notify you of significant changes by contacting you directly where reasonably possible for us to do so, and by placing an updated notice on our website.

Links and third parties

We link our website directly to other sites. This Notice does not cover external websites and we are not responsible for the privacy practices or content of those sites. We encourage you to read the privacy notices of any external websites you visit via links on our website.

How to contact us

For all questions or concerns regarding the processing of your personal information, please do get in touch. You can write to:

YMCA Derbyshire
Data Protection Officer
770 London Road
Wilmorton
London Road