



young gloucestershire

Privacy and Cookies Policy

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1	April 2023	Tracy Clark	New	

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Introduction

We are committed to safeguarding the privacy of our website visitors and service users.

This policy applies where we are acting as a data controller with respect to the personal data of such persons; in other words, where we determine the purposes and means of the processing of that personal data.

Our website incorporates privacy controls which affects how we will process your personal data. By using the privacy controls, you can specify whether you would like to receive direct marketing communications and limit the collection, sharing and publication of your personal data.

We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

In this policy, 'the organisation' "we", "us" and "our" refer to Young Gloucestershire/Infobuzz

The personal data we collect

We have set out the general categories of personal data that we process and, in the case of personal data that we did not obtain directly from you, information about the source and specific categories of that data.

We may process data enabling us to get in touch with you. The contact data may include your name, email address and telephone number. The source of the contact data is you and/or whomever may be making a referral on your behalf. If you access our website using a social media account, we will obtain elements of the contact data from the relevant social media account provider. The communication data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms.

We will process your information when you sign up to our newsletter. You will be able to unsubscribe at any time by selecting the "unsubscribe" option at the end of our newsletter.

We may process data about your use of our website and services. The usage data may include your IP address, geographical location, browser type and

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version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use.

Please do not supply any other person's personal data to us, unless we prompt you to do so. We will only ask you to do so for us to offer you a service.

Purposes of processing and legal bases

We have set out the purposes for which we may process personal data and the legal bases of the processing.

- Operations - We may process your personal data for the purposes of providing you with a service. If you are a referrer, please ensure you have consent from the individual you are referring.
- Personalisation - We may process usage data for the purposes of personalising the content that you see on our website and through our services to ensure that you only see material that is relevant to you. The legal basis for this processing is consent.
- Direct marketing - We may process contact data for the purposes of creating, targeting and sending direct marketing communications by email, SMS, post and/or fax and making contact by telephone for marketing-related purposes. The legal basis for this processing is consent.
- Research and analysis - We may process usage data and service data for the purposes of researching and analysing the use of our website and services, as well as researching and analysing other interactions with our charity. The legal basis for this processing is consent.
- Safeguarding - We may process your personal data for the purposes of security and the prevention of fraud and other criminal activity. The legal basis of this processing is our legitimate interests, namely the protection of our website, services and business, and the protection of others.
- Insurance and risk management - We may process your personal data where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks and/or obtaining professional advice. The legal basis for this processing is our legitimate interests, namely the proper protection of our charity against risks.

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- Legal claims, compliance and vital interests - We may process your personal data where necessary for the establishment, exercise or defense of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is our legitimate interests, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

Providing your personal data to others

We may disclose your personal data to other professionals in order to offer you a service. This will be with your consent.

We also store your data using a third-party hosting provider (Upshot) for case management purposes.

Please note that should we be concerned about your or another person's safety, we may provide your information to other professionals without your consent in order to safeguard you or another living person.

Retaining and deleting personal data

This section sets out our data retention policies and procedures, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

We will retain your personal data for a minimum period of seven years only if you have accessed our services. We will do this with your consent.

In some cases, it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the service you access and our reporting requirements.

Security of personal data

We will take appropriate technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data.

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We will store your personal data on secure servers, personal computers and mobile devices, and in secure manual record-keeping systems.

Data relating to your enquiries that is sent from your web browser to our web server, or from our web server to your web browser, will be protected using encryption technology.

You acknowledge that the transmission of unencrypted or inadequately encrypted data over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

Your rights

In this section, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

- Your principal rights under data protection law are:
 - the right to access - you can ask for copies of your personal data;
 - the right to rectification - you can ask us to rectify inaccurate personal data and to complete incomplete personal data;
 - the right to erasure - you can ask us to erase your personal data;
 - the right to restrict processing - you can ask us to restrict the processing of your personal data;
 - the right to object to processing - you can object to the processing of your personal data;
 - the right to data portability - you can ask that we transfer your personal data to another organisation or to you;
 - the right to complain to a supervisory authority - you can complain about our processing of your personal data; and
 - the right to withdraw consent - to the extent that the legal basis of our processing of your personal data is consent, you can withdraw that consent.
- You have the right to confirmation as to whether we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. This will be provided free of charge.

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- You have the right to have any inaccurate personal data about you rectified and, considering the purposes of the processing, to have any incomplete personal data about you completed.
- In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; you object to the processing under certain rules of applicable data protection law; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are exclusions of the right to erasure. The general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are you contest the accuracy of the personal data; processing is unlawful, but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.

You have the right to object to our processing of your personal data on grounds relating to your situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

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Legal Basis for our processing of your personal data

To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to which you are party or in order to take steps at your request prior to entering a contract,

- you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- If you consider that our processing of your personal data infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection.

To the extent that the legal basis for our processing of your personal data is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

Our website includes hyperlinks to, and details of, third party websites

In general, we have no control over, and are not responsible for, the privacy policies and practices of third parties.

When you click on the “Access Services” button, you will be taken to a sign-up form hosted on our Case Management System (database) “Upshot”. Thereby creating a record of your referral on the database. This is reviewed and followed up by our referral team to determine the next course of action.

Personal data of children

Our website and services are targeted at persons over the age of 11 years and above.

If we have reason to believe that we hold personal data of a person under that age in our databases, we will delete that personal data.

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Updating information

Please let us know if the personal information that we hold about you needs to be corrected or updated.

Acting as a data processor

As a charity we are funded by various commissioners which means in some instances we do not act as a data controller; instead, we act as a data processor.

Insofar as we act as a data processor rather than a data controller, this policy shall not apply. Our legal obligations as a data processor are instead set out in the contract between us and the relevant data controller (for example, Gloucestershire County Council and Gloucestershire Integrated Care Board)

About cookies

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies may not contain any information that personally identifies a user, but personal data that we store about you may be linked to the information stored in and obtained from cookies.

Cookies that we use

We use cookies for the following purposes:

analysis - we use cookies to help us to analyse the use and performance of our website and services; and

cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

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Cookies used by our service providers

Our service providers use cookies, and those cookies may be stored on your computer when you visit our website.

We use Google Analytics. Google Analytics gathers information about the use of our website by means of cookies. The information gathered is used to create reports about the use of our website. You can find out more about Google's use of information by visiting <https://www.google.com/policies/privacy/partners/> and you can review Google's privacy policy at <https://policies.google.com/privacy>.

Managing Cookies

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

- (a) <https://support.google.com/chrome/answer/95647> (Chrome);
- (b) <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop> (Firefox);
- (c) <https://help.opera.com/en/latest/security-and-privacy/> (Opera);
- (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);
- (e) <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac> (Safari); and
- (f) <https://support.microsoft.com/en-gb/help/4468242/microsoft-edge-browsing-data-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites.

If you block cookies, you will not be able to use all the features on our website.

Cookie Preferences

Our website only uses essential cookies. We use Google Analytics with IP address anonymization enabled protecting your person identifiable data (PID).

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Amendments

We may update this policy from time to time by publishing a new version on our website.

You should check this page occasionally to ensure you are happy with any changes to this policy.

Our details

This website is owned and operated by Young Gloucestershire and Infobuzz

We are registered in England and Wales under registration number 01547097 and our registered office is at Old Dock Office, Commercial Road, Gloucester, GL1 2EB

Our principal place of business is at Old Dock Office, Commercial Road, Gloucester, GL1 2EB

You can contact us:

- (a) by post, to the postal address given above;
- (b) using our website contact form;
- (c) by telephone, on 01452 501008
- (d) by email, using getinvolved@youngglos.org.uk

Data protection registration

We are registered as a data controller with the UK Information Commissioner's Office.

Our data protection registration number is Z2348039

Data Protection Officer

Our data protection officer is Tracy Clark

Our data protection officer's contact details are:

01452 501008

getinvolved@youngglos.org.uk

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