



## PRIVACY POLICY - SUPPORTERS

### 1. The aim of this Privacy Policy

Our supporters - individuals, companies, trusts, foundations, and Local Authority - are extremely important to us, and this Privacy Policy explains how CYP collects, stores, manages and protects your data. It outlines the types of data that we hold and how we use them to communicate with our supporters. We aim to be clear when we collect your personal information, and not do anything you would not reasonably expect.

### 2. Who we are and what we do

- 2.1 CYP is a voluntary-funded community-based youth club. To do this we fundraise to keep the Club alive and thriving each year and to ensure both our core and capital costs are covered. We do this by applying to grant-making charitable trusts, foundations, government and by building relationships with individual and corporate supporters, and prospective supporters, through a range of social, networking and fundraising events, each year. We keep those supporters in touch with the scope and impact of our work through newsletters, both printed and electronic.
- 2.2 In order to do this, we have a database that contains personal data collected by CYP from individuals who have taken part in our events, referred to us by another supporter, have signed up to receive our newsletter via the website or have expressed an interest in hearing more about CYP and its work. We always aim to keep your details up to date. As a result, some of the data may also have been obtained from publicly available sources – for example, we may find a new address for you by using the Royal Mail's National Change of Address database (NCOA). We may also use information from publicly available sources to carry out research to assess your inclination and capacity to support CYP financially or by volunteering your time. More information on these activities is below and you will always have the right to opt out. We value our relationship with you and we use your personal data to ensure we contact you in the most appropriate way, improve our services and to ensure we work efficiently and effectively.
- 2.3 CYP is the Data Controller, which means we determine the purposes and means of processing personal data. We are also a Data Processor, meaning we are responsible for processing personal data on behalf of the Controller.

### 3. Our responsibilities and legal basis for processing your data

- 3.1 As part of our work we process and store personal information relating to current and potential supporters and we therefore adhere to the new Data Protection Act which comes into effect on May 25 2018, we will review our data processing practices as required by and in line with the most up-to-date UK legislation.
- 3.2 CYP processes the information outlined in this Privacy Policy either because you have given us your *consent* or in pursuit of our *legitimate interests* in where this is not overridden by your interests and rights or freedoms and legal obligations:
  - Communicating with current and potential supporters
  - Furthering CYP's charitable mission (which includes fundraising and securing the support of volunteers);
  - Enabling CYP to achieve its strategic and operational goals.



We may pursue these *legitimate interests* by contacting you by telephone, post or social media. Your *consent*, and information about how you can manage the ways that we contact you, including how to opt in/out from some or all contact from CYP, is outlined in the 'Your rights' section below.

#### 4. The data we hold

CYP maintains a record of current, former and prospective supporters. The personal data we store and process, the majority of which is given to us by our supporters but some of which we may obtain from other sources, may include:

- name, title, gender and date of birth;
- contact details including postal address, email address, phone number and links to social media accounts;
- your occupation and professional activities;
- your recreations and interests;
- family and spouse/partner details and your relationships to other supporters;
- records of donations and Gift Aid status, where applicable (as required by HMRC);
- records of communications sent to you by CYP or received from you;
- volunteering by you on behalf of CYP;
- information about your wealth (although we will **never** carry out wealth screening, a process which uses third- party partners to automate some of this work);
- media articles about you;
- information on your engagement in CYP, events, groups or network

#### 5. How we use your data

- 5.1 Unless you have requested otherwise, your data are accessible to CYP and may be used and processed for a full range of engagement and fundraising purposes. These include the following communications and marketing activities, which may be sent by mail, email, telephone and social media:
- Sending CYP's news publications and impact reports;
  - Notification of events;
  - Fundraising events and appeals.
- 5.2 CYP may use third-party partners to support the activities described above. If you interact with CYP through a third party (for example, supporting CYP via Local Giving) then we may obtain information about you from that third party. The receipt of data by CYP in this manner is subject to the third party's own privacy policy.

Data obtained in this way are treated no differently to any other once held by CYP, and are bound by the terms of this Privacy Policy as soon as they are received.

- 5.3 Tools may be used to help us improve the effectiveness of CYPs communications with you, including tracking whether the emails we send are opened and which links are clicked within a message.

#### 6. How we gather and update your data

- 6.1 As we are a fundraising charity we may gather information about you from publicly available sources – for example, Companies House, the Electoral Register and the media – to help us to understand more about you as an individual and your ability to support CYP, including financially. We will **never** carry out wealth screening, a process which uses third-party partners to automate some of this work. We may use information



gathered from public sources alongside the information you provide to undertake analysis of who might support CYP and to understand the preferences of our supporters about events, communication and services. By doing this, we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you.

- 6.2 If you provide us with contact details for a particular method of communication we will assume that you have given us your consent for us to update your record and communicate with you using this information, unless you have told us otherwise. Contact details provided directly by you will update any previous preferences in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) but provide us with a telephone number we will assume that we have your consent to call you on this number.
- 6.3 Fundraising is a key part of CYP's work, and we are committed to working in a transparent, ethical, responsible and honest way.

## **7. Protecting your data**

- 7.1 Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside CYP other than those which are acting as agents for CYP (for example, if we use an external mailing house to print and send our newsletters). All external entities with whom data are being shared and to whom we are not legally bound must sign a contract and/or a confidentiality and non-disclosure agreement before any data transfer takes place. We do not share with, sell to or trade your data with any other organisations.

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers are located in a country outside the EEA.

## **8. Your rights**

CYP considers its relationship with supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. You will always have the right to:

- Be informed as to how we use your data (via this Privacy Policy);
- Access or request a copy of the data we hold about you;
- Update, amend or rectify the data we hold about
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from CYP.
- Ask us to suppress your data from our records;
- Withdraw consent, where it is used as a legal basis for processing;
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you have any questions about this Privacy Policy, or would like to receive a copy of the information we hold about you, please contact us at: Tel: 020 7278 7400, [theo@cyproject.org](mailto:theo@cyproject.org)

## **9. Future changes**

From time to time, we may use your information for new purposes not currently described in this Privacy Policy. If our information practices change at some time in the future, we will always post the policy changes on this page.



