



Service Users Privacy Notice

Copenhagen Youth Project (CYP)

Last Updated:	April 2026
Approved by Trustees:	April 2026
Review Date:	March 2027

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be achieved through information alone or in conjunction with other information held by the data controller. The processing of personal data is governed by the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**.

Who are we?

Copenhagen Youth Project (CYP) is the data controller of your personal data. This means we determine how and why your personal data is processed. To exercise your rights, or for any queries or complaints, **please contact CYP's Chief Operating Officer, Theo Thomas: theo@cyproject.org**.

CYP may need to request specific information from you to confirm your identity when you exercise your data protection rights. This is a security measure to ensure that personal data is not disclosed to anyone who does not have the right to receive it.

You can contact the Information Commissioners Office on:

- **Phone:** 0303 123 1113
- **Web:** <https://ico.org.uk/global/contact-us/> **Address:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

How do we process your personal data?

CYP complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data. We process your personal data for the following purposes:

- To enable us to run events and activities.
- To administer membership records.
- To fundraise for charitable purposes.
- To inform you of news, events, activities and services run by CYP, or by others which we think may interest you.

We process the following types of personal data: name, contact details, date of birth and any additional information that may be necessary for the above purposes.

CYP processes personal data under the lawful bases set out in the UK GDPR, including consent, legitimate interests (for running activities and improving services), and compliance with legal obligations such as safeguarding. Where we rely on consent, you may withdraw this at any time.

What is the legal basis for processing your personal data?

CYP processes your personal data based on the following legal grounds:

- **Your explicit consent** for the purposes outlined above.
- **Processing is necessary for the performance of a contract** (If applicable, e.g., membership registration).
- **Processing is necessary for carrying out legal obligations**, such as safeguarding duties.

We will ensure that your consent is **freely given, specific, informed, and unambiguous**.

Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with:

- Relevant members of the CYP team for the purposes above.
- Islington Council (if applicable) for funding purposes and only when required.
- Third parties, such as service providers, with your consent (We will ensure that any third parties receiving your data have appropriate safeguards in place to protect your privacy and comply with data protection laws.)

There may be occasions when exceptional circumstances prevail, for example when the person or a third party are at risk or in immediate danger.

For example:

- Where CYP is required to disclose information by written instruction to its staff from a court, the police or a similar legal authority.
- Where the person concerned is clearly putting themselves at risk and requires medical supervision to protect their physical and mental health and well-being e.g. the person has been involved in an accident, the person is suffering from a drug overdose.
- Where CYP considers that based on the assessments its staff are able to make, they have reasonable concerns about the person's emotional and mental health, and the risks this could pose to the person's continued safety and well-being, to staff, and to other persons.
- Where a third party is at risk of danger or abuse, e.g. where a sibling is left within the family and/or is being abused.
- Where CYP is following the procedures for situations set out in its Child Protection / Safeguarding policy which is published on the CYP website.

We may also share your information with regulatory bodies or authorities where required by law, such as HMRC, the Charity Commission, or law enforcement agencies.

If CYP needs to transfer personal data outside the UK in the future, it will only do so where appropriate safeguards are in place, such as adequacy regulations or standard contractual clauses, and Users will be informed.

Storing your personal data

All records will be kept securely in a lockable filing cabinet or behind password protection for digital data. Only relevant staff will have access.

Digital personal data is protected through access controls, secure systems, password protection, and regular monitoring. CYP ensures that staff handling personal data receive appropriate data protection training.

How long do we keep your personal data

We retain your personal data until we believe you no longer wish to be involved with CYP or have requested its deletion. **We retain records for five years** after a person's departure from CYP unless required by law or safeguarding requirements to retain data for longer.

Retention periods may vary depending on the nature of the data and legal requirements. Where possible, CYP will inform you of specific retention periods at the point of data collection.

Internal Confidentiality

Information will only be shared within the team if it is deemed necessary to meet the needs of the young person. Care will be taken to ensure that discussions are confined to relevant staff members, and sensitive information will not be discussed in front of individuals not part of the team. They should be made aware of this and no promises made that we will never share information and issues within the team. It can be made clear at the time that staff may need to do this, not only for staff support, but to provide a better service for individuals. Care will be taken to ensure that issues are not discussed within the hearing of others who are not part of the team. Some information regarding young people may need to be discussed in support and supervision meetings.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data:

- **The right to access** a copy of your personal data.
- **The right to correct** inaccurate or incomplete data.
- **The right to erase** your personal data when it is no longer necessary for processing.
- **The right to withdraw consent** at any time (without affecting the lawfulness of processing).
- **The right to data portability**, if applicable.
- **The right to restrict processing** in cases of dispute.
- **The right to object** to the processing of your data.
- **The right to lodge a complaint** with the Information Commissioner's Office (ICO) - You have the right to lodge a complaint with the ICO if you believe your data has been processed unlawfully.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will inform you and provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Review of this Privacy Notice

CYP will review this privacy notice annually, or sooner if required by changes in legislation or organisational practices. CYP may update this notice from time to time to ensure continued compliance with UK data protection law. Service users will be notified of any significant changes.