

Red House Youth Trust Privacy Statement

The Purpose of this privacy statement is to explain, in general terms, how Red House Youth Trust (RHYT) processes your personal data from the moment it is collected to the point it is deleted or destroyed.

The Role of RHYT in data protection terms is that of a data controller because it determines the purposes and means of the personal data we collect. Once received it becomes the responsibility of the RHYT privacy officer (PO) to ensure that it is processed in accordance with the latest UK legislation.

Should you have a query regarding the contents of this privacy statement or about the way we process your personal data, please contact the PO in the first instance by emailing admin@redhouseyouthprojects.co.uk or by writing to: The Privacy Officer, Red House Youth Project, PO Box 1287, North Walsham, NR28 8AA

The personal data processed by RHYT will only be basic contact information i.e. names, addresses, telephone numbers and an email address. Please also that:

- Only the personal data of the person making a booking for Dunton Centre will be recorded;
- For the purposes of making a grant application, it is necessary to record details of the supporting referee as well as the applicant; and
- Personal data of the trustees, the grant manager, the administrator and the warden of the Dunton Centre is collected for the purposes of administering the Trust.

The way we collect or receive your personal data is either:

- Directly from you when you make an enquiry through the web page contact form, or by a direct call, by email or the result of a meeting the Trust's staff; this could be for both Dunton Centre bookings or for a grant application; and
- In the case of Trustees, your personal data is collected from you directly, normally in written form.

RHYT's duty of confidentiality means that RHYT staff, including the Dunton Centre warden, will treat your personal data in confidence. RHYT uses reasonable organisational and technical measures to ensure personal data is safe guarded. Access is strictly limited to those members of staff who need it.

RHYT also expects the same duty of confidentiality of all third parties with whom we need to share your personal data for the purposes of fulfilling our contractual obligations to you. All such third-parties are subject to a due diligence review.

RHYT will process personal data using a lawful basis; such instances are described below:

- When we have a **legitimate interest** to respond to your general enquiries, or where we have obtained your details from a third party;
- To fulfil our **contractual obligations** to you when you make a booking for the Dunton

- Centre or when you are making or supporting a grant application;
- When we have **your consent** for the purposes of administering you as a trustee. Please be aware that you have the right to withdraw your consent at any time; and
- To comply with our **legal obligations**, normally relating to the Trust's obligations to the Charities Commission and HMRC.

In all cases the processing of personal data shall be:

- Processed lawfully, fairly and transparently;
- Collected for specified, explicit and legitimate purposes;
- Adequate, relevant and limited to what is necessary (and no more);
- Accurate and, when necessary, updated;
- Kept for no longer than is necessary; and
- Processed in a manner that ensures appropriate levels of safeguarding.

RHYT will never sell your personal data and will only disclose it when it's absolutely necessary, to some or all of the following third parties:

- The Charities Commission;
- Company accountant appointed by RHYT;
- HMRC for invoice related activities;
- IT service support company for maintenance purposes; and
- Unspecified recipients but only when compelled to do so for legal reasons.

RHYT will process your personal data in the UK. It should be noted that no personal data is stored on the RHYT website server. Phone messages left on the phones of either the admin officer or grants officer will be deleted once the messages have been heard.

RHYT follows a retention schedule to determine the length of time it holds different types of personal data of the customer. The key points of the schedule are shown below:

- If you have made a general enquiry about the Trust that does not result in a booking or initiating a grant application, we will routinely delete your information within 2 weeks;
- If you have made a booking for the Dunton Centre, we will routinely delete any information we have collected about you after 2 years from the latest booking;
- If you have made or supported a grant application, this information will be archived for 2 years after its consideration or actual award, before it is deleted or destroyed;
- If you are a Trustee, your personal data will be deleted or destroyed once your tenure has finished, unless you give your consent for your information to be retained;
- If we have your consent to hold your contact details for whatever reason, including that of a Trustee, we will retain them until such a time you want to withdraw your consent;
- For financial records and invoices, which may include your personal data, these will be retained for 6 years after the end of the current tax year of processing.

By exception, documentation that includes your personal data may be retained by RHYT beyond the schedule, but only for a specific purpose and only when RHYT believes there is a legitimate interest or has a legal obligation to do so.

At the end of the retention schedule RHYT will either return, destroy or delete/ anonymise your personal data and any associated emails or relevant documentation. If it is technically impractical to do so, we will put it beyond operational use.

The RHYT website uses cookies (and similar technologies) in order to:

- ensure our website runs properly;
- give you the best possible user experience; and
- collect website user statistics for analytical purposes with your permission.

RHYT does not attempt to identify individuals who visit the website.

The General Data Protection Regulation defines the rights that you have (although these do not apply in all situations). For convenience, these rights are shown below:

- **Right to be informed** as to how your personal data is being processed by RHYT – this is done through this privacy policy and/or separate RHYT privacy notices when appropriate;
- **Right to access** your personal data held by RHYT which is done by making a ‘Data Subject Access Request’ (DSAR) to the RHYT privacy officer;
- **Right to rectification** of your personal data if you believe RHYT has collected it incorrectly or it needs to be updated;
- **Right to erasure** of your personal data for which RHYT no longer has an overriding lawful basis with which to process;
- **Right to restrict processing** under certain circumstances, during which time your personal data will be out of operational use until the related matter is resolved;
- **Right to data portability** in a machine-readable version of the personal data you have provided to us, but this only applies to data provided with your consent or under contract;
- **Right to object** to RHYT processing your personal data when it does not relate to a legal or contractual obligation; and
- **Rights related to automated decision making and profiling** (however RHYT does not use these techniques in its decision making).

Further details on data subjects’ rights can be found on the Information Commissioner’s Office (ICO) website: <https://ico.org.uk>.

Raising concerns about the way we are processing your personal data can be done by contacting the RHYT privacy officer, but if you prefer, you can also contact the ICO directly.

Exercising rights or making queries can be done by contacting the RHYT privacy officer. Before proceeding with any request made or handling any concerns raised to RHYT, we need to be sure of your identity therefore it may be necessary to ask you for proof of your identity.