

<b>Title</b>	Privacy Policy	
<b>Description of Policy / What is it for?</b>	This is the YMCA Norfolk Privacy Policy, which details our commitment to the secure processing, storing, using, retaining and disposing of contact information provided by the general public.	
<b>Define purpose / objective:</b>	To explain how and why we use personal data and to ensure the general public remain informed and in control of their information which they provide to us.	
<b>Scope:</b>	The policy applies to all information we collect for non-contractual purposes.	
<b>Other relevant approved documents:</b>	<ul style="list-style-type: none"> <li>Information Security Policy</li> </ul>	
<b>Review Date</b>		
<b>Review Draft Prepared by:</b>	Fundraising and Marketing Manager	
<b>Consultation:</b>	None	
<b>Consultation with young people</b>	None	
<b>Equality Impact Assessment:</b>	EIA Completed? YES EAI Completed by: Robert Canniffe	Date Completed: 07/02/2018
<b>Dissemination:</b>	Is there any reason why any part of this document should not be available on the public web site? No	
<b>Brief outline of amendments (please include section references):</b>	New policy.	



**EQUALITY IMPACT ASSESSMENT TOOL**

Policy:	<b>Privacy Policy</b>
Policy Owner:	Fundraising and Marketing Manager

**PLEASE ANSWER THE FOLLOWING QUESTIONS**

What are the aims, objective, and purpose of the policy or service, including desired outcomes?
To explain how and why we use personal data and to ensure the general public remain informed and in control of their information which they provide to us.
On whom will the policy or service impact?
The policy applies to all information we collect for non-contractual purposes.

Will the policy or service exclude any of the following groups?			
	Yes	No	If yes, how?
Age		X	
Disability		X	
Gender Re-assignment		X	
Marriage & Civil Partnership		X	
Pregnancy & Maternity		X	
Race		X	
Religion & Belief		X	
Sex (gender)		X	
Sexual Orientation		X	

Will any policy have an impact or adverse affects on anyone’s vulnerability?
No



Could the policy/schedule have a negative impact on the following groups?	Yes	No
<b>Age</b>		
Do we discriminate against any age groups (for example early years 0-5 and older people)?		X
<b>Disability</b>		
Do we discriminate against those with a physical disability (eg access to a building)?		X
Do we discriminate against those with a hearing impairment (consider loop systems, signing if required)?		X
Do we discriminate against those with a visual impairment (access to appropriate information, producing this in large print, braille)?	X	
Do we discriminate against those with mental ill health?		X
Do we discriminate against those with a long term condition?		X
<b>Gender re-assignment</b>		
Do we discriminate against those who are in the process of or have had a gender re-assignment (has the physical environment e.g., access to toilets, and emotional wellbeing of the individual been considered)?		X
<b>Marriage &amp; Civil Partnership</b>		
Do we discriminate against those who are married or in a civil partnership?		X
<b>Pregnancy &amp; Maternity</b>		
Do we discriminate against those who are pregnant (e.g., have we considered access to amenities, sterilisation of bottles, management of risks, move-on options etc)?		X
<b>Race</b>		
Do we discriminate on the grounds of race? For example, have we considered the following: <ul style="list-style-type: none"> <li>• language barriers (providing access to interpreters and information in other language)</li> <li>• social isolation</li> <li>• cultural differences</li> </ul>	X	
<b>Religion and belief</b>		



Do we discriminate on the grounds of faiths (for example, signposting or providing space for prayer and reflection)?		X
<b>Sex</b>		
Do we discriminate on the grounds of gender?		X
<b>Sexual orientation</b>		
Do we discriminate on the grounds of sexual orientation (have we considered social isolation)?		X

**Where you have identified a negative impact, please complete the action plan below.**

Negative Impact identified	Action to Mitigate Negative Impact
Discrimination against those with a visual impairment.	Document details will be provided in format that can be accessed and communication between staff members and clients will be conducted in the most reasonable format. We will work with other organisations around provision of equipment where required.
Discrimination on the grounds of race	We will ensure we gather all information on the person concerned around language barriers, social isolation and cultural differences. We will ensure we meet all identified needs and make any reasonable adjustments as required.



---

# PRIVACY POLICY

---

**Document Control**

Version No.	Policy Owner	Prepared By	Date Approved by Board
1/1	Marketing and Fundraising Manager	Marketing and Fundraising Manager and Performance Officer	
Date of Next Review	Reviewed By:	Date of Review	



## **CONTENTS**

<b>1. POLICY STATEMENT</b>	<b>7</b>
<b>2. PURPOSE</b>	<b>7</b>
<b>3. SCOPE &amp; IMPLEMENTATION</b>	<b>8</b>
<b>4. POLICY DETAILS</b>	<b>8</b>
<b>5. MONITORING, EVALUATION &amp; REVIEW</b>	<b>12</b>



## 1. POLICY STATEMENT

- 1.1 This is the YMCA Norfolk Privacy Policy, which details our commitment to the secure processing, storing, using, retaining and disposing of personal information provided by the general public.
- 1.2 YMCA Norfolk is committed to its mission to transform young lives and delivers a range of services to achieve this aim. In order to achieve its aim, YMCA Norfolk requires support and funding for its service delivery.
- 1.3 As part of its publicity and fundraising, YMCA Norfolk sends details of its fundraising activities to the general public who wish to hear about them.
- 1.4 YMCA Norfolk is committed to protecting and respecting your privacy. Whenever you provide any personal information to us, we will treat your information in accordance with this privacy policy and in accordance with the General Data Protection Regulation 2018.
- 1.5 YMCA Norfolk will ask for and gain consent before sending any information to the general public. YMCA Norfolk will also ask for contact details in order to send information.
- 1.6 YMCA Norfolk will securely process contact information and store and retain it on a secure storage location. The contact information will only be used for the purposes as described in this policy and will not be shared with third parties.

## 2. PURPOSE

- 2.1 The aims of the Privacy Policy are:
  - To inform the general public how and why we use their personal data and to ensure they remain informed and in control of their information.
  - To allow for opt-in to marketing.
  - To inform the general public of our commitment to securely storing their personal information they have provided and using this to communicate with them.
  - To ensure YMCA Norfolk is compliant with the General Data Protection Regulation (implemented on 29 May 2018).

### 3. SCOPE & IMPLEMENTATION

3.1 The policy applies to all information we collect for non-contractual purposes.

### 4. POLICY DETAILS

#### Personal Information We Collect

- 4.1 When you donate, register online, take part in a sponsored event, contact us or interact with us in any other way, YMCA Norfolk will ask for personal information about you, such as your name, address, telephone number, email address, debit/credit card or direct debit details.
- 4.2 We will clearly ask for your consent for us to keep your personal information.
- 4.3 In addition, we will also keep details of YMCA Norfolk activities and events you have attended
- 4.4 Details of any financial payment or donation you have made will be kept securely as part of our financial procedures.

#### How we Use Your Information

- 4.5 YMCA Norfolk will only use your information with your consent and for the purposes it was collected for, such as:
- processing a donation that you have made.
  - sending you information about our work and how you can continue to support YMCA.
  - sending you communications you have subscribed to.
  - responding to correspondence you have sent to us.
  - making you aware of events that you can support.
  - maintaining databases of supporters and volunteers.
  - helping us monitor your ongoing consent for information.
- 4.6 We will only contact you through approved YMCA Norfolk communications. You will only receive email addresses from us, which will end with @ymcanorfolk.org.
- 4.7 We aim to respond to any query from you within seven working days.



## **Opt-in**

- 4.8 YMCA Norfolk will ask you to “opt-in” for communications as part of new legal requirements. This enables you to choose how we communicate with you.
- 4.9 Please contact us and let us know how you would like to receive communications from us.

## **Images**

- 4.10 Anyone who engages with our services, events and activities may have images taken of them whilst participating. When we take images we will always advise when we are taking them and give opportunity to opt out.
- 4.11 We may use these photos in our marketing material.
- 4.12 We will only publish these photos with your consent. If you are unhappy with your photo being used, please contact us. We will only publish photos of children and young people under 13 with parental consent.

## **Marketing and Fundraising**

- 4.13 Marketing and Fundraising raise awareness of the activities and work of YMCA Norfolk.
- 4.14 We communicate this information to our supporters and this includes:
- Newsletters
  - Advertising for upcoming events
  - Information on making donations
  - How to support us
- 4.15 We will only communicate this information if you have given your consent.

## **Disclosure of Your Information**

- 4.16 We will keep your personal information confidential and will not disclose it to any third party without your consent, unless we are obliged to do so by law or it is necessary to process information on your behalf. For example, providing details to process online donations.

- 4.17 In the event that we are required to share your personal information by law, we will contact you to inform you this process is being undertaken.
- 4.18 We require third parties to keep your information secure and not to use it or share it for their own business purposes.
- 4.19 We only work with reputable organisations who have appropriate policies and procedures in place to safeguard personal information.

### **Accessing and Updating Your Personal Information**

- 4.20 You can request any information we hold about you by using the details below:

Email: [privacy@ymcanorfolk.org](mailto:privacy@ymcanorfolk.org)

Phone: 01603 621263

Website: [www.ymcanorfolk.org/privacy](http://www.ymcanorfolk.org/privacy)

Post: 35-37 Exchange Street, Norwich, Norfolk, NR2 1DP

- 4.21 Please help us to keep your information and preferences up to date by letting us know of any changes using the contact details above.

### **Removing Consent**

- 4.22 You have the right to let us know at any time if you want to change how you hear from us or advise us if you no longer wish to receive any further communications from us. You can do this by calling or emailing with the details above.
- 4.23 We will confirm to you when we have removed your information via the method of communication you used to request it.

### **Secure Storage of Information**

- 4.24 Information will be stored in secure storage areas once it has been collected. Information will not be stored in any other storage area other than that approved by YMCA Norfolk.
- 4.25 Information will be saved electronically on secure servers and can only be accessed from accounts approved by YMCA Norfolk or from trusted third parties administering the system.



- 4.26 All computers and accounts have anti-virus systems and firewalls to prevent loss or theft of information. This will also include the network.

### **Secure Retention of Information**

- 4.27 All information will be retained during its processing, storage and use. Information will be kept for the retention period as directed by law. We will not keep your personal data for any longer than is necessary or for what you have agreed.
- 4.28 The retention period is set to 2 years. We will contact you within 2 years to renew your consent.

### **Further Rights Around Personal Information We Hold**

- 4.29 You have the right to request if we hold your personal information and, if we do, to obtain a copy of this (this is known as subject access request). Please contact us with the details in 4.20.
- 4.30 You also have the right to have your data erased. However, this will not apply where it is necessary for us to continue to use the data for a lawful reason. We will inform you of the reason why a request for data erasure will be rejected.
- 4.31 You have the right to access personal data which we process automatically on the basis of your consent. We will provide this information in a common electronic format where feasible.

### **Cookies**

- 4.32 The YMCA Norfolk website uses 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. This will not contain any personal identifiable information.
- 4.33 We use Google Analytics cookies to collect anonymous traffic data, such as page visit information, where the visitors to the site had come from and the browser and operating systems used. This information is stored by Google and subject to their privacy policy.
- 4.34 The site also makes use of session cookies. These cookies are necessary for site functionality and contain no personally identifiable information. They are deleted when the browser is closed.



- 4.35 For more information about cookies, including how to block or delete them, visit [AboutCookies.org](http://AboutCookies.org)

### **Third Party Websites**

- 4.36 The YMCA Norfolk website may include links to other websites. This includes our Facebook and Twitter pages.
- 4.37 These links are provided for your convenience to provide further information. We are NOT responsible for these websites.
- 4.38 As with all of our sites and pages, any information we collect from you will be stored securely.
- 4.39 For third party sites, please make sure you read the privacy policy on that site as our policy does not cover these sites.

### **Complaints**

- 4.40 If you wish to make a complaint about YMCA Norfolk, please email [info@ymcanorfolk.org](mailto:info@ymcanorfolk.org). You will hear a response from us within seven working days. If you wish to see our Complaints Policy and Procedure, you may request this from the email above.
- 4.41 If you are not happy with our response, or you believe that your data protection or privacy rights have been infringed, you can complain to the UK Information Commissioner's Office which regulates and enforces data protection law in the UK. Details of how to do this can be found at [www.ico.org.uk](http://www.ico.org.uk).

### **Changes to This Privacy Policy**

- 4.42 Any changes to this policy will be included in our newsletter or general mailout.

## **5. MONITORING, EVALUATION & REVIEW**

- 5.1 This policy will be monitored and reviewed by the Fundraising and Marketing and Finance and Performance teams annually in line with requirements of the relevant committee or sooner in conjunction with changes in local and national legislative or policy guidance.