
Privacy Notice

Contents:

- Who We Are
- Lawful Processing
- Data Rights
- What Type Of Personal Data Is Collected?
- How We Collect Your Personal Data
- Why We Collect Personal Information
- Who We Share Your Personal Data With
- Cookies
- Third Party Websites
- Protecting Your Personal Data
- How Long We Store Your Personal Data For
- Changes To This Privacy Notice
- Complaints

Your Privacy Matters

At YMCA Norfolk we are committed to keeping your personal data safe and secure and handling it in accordance with our legal obligations.

This Privacy Notice sets out in detail the purposes for which we process your personal data, who we share it with, what rights you have in relation to that data and everything else we think it's important for you to know.

If your company enlists our services, your company and our services may enter into a separate agreement that will govern the processing of all information and data collected in connection with the service, including some data collected through our websites. Such agreement takes precedence over any conflicting provision in this notice.

Who We Are

YMCA Norfolk is an inclusive Christian organisation transforming young lives across Norfolk, enabling them to belong, contribute and thrive in their communities.

We believe in fairness and opportunity and that the essential building blocks for a full and rewarding life are a safe home; acceptance; guidance; friendship; physical and mental health; academic support; employment skills; and access to real opportunities.

(registered charity number 801606)

It is also a company registered in England and Wales (company number 02067523), and its registered office is YMCA Norfolk, Aylsham Road, Norwich, NR3 2HF.

YMCA Norfolk owns and operates the following websites:

- www.ymcanorfolk.org
- www.williamskitchen.org
- www.muddy-puddles.org
- www.e-learning-service.org

YMCA Norfolk is registered as a data controller with the Information Commissioners Office (ICO registered number ZB253870).

We collect and process a range of personal data in order to provide our services. This includes name, postal address, email address, date of birth, gender, specific learning difficulties, disabilities and IP address depending on the type of enquiry or service.

Lawful Processing

The lawful bases for processing are set out in Article 6 of the UK General Data Protection Regulation ("the UK GDPR"). At least one of these must apply whenever personal data is to be processed:

- (a) **Consent:** you have given YMCA Norfolk freely, specific, informed or unambiguous consent for your personal data to be processed for a specific purpose.
- (b) **Contract performance:** the processing is necessary for the performance of a contract you have with YMCA Norfolk, which had asked you to take specific steps before entering into a contract.
- (c) **Compliance with legal obligation:** the processing is necessary for YMCA Norfolk to comply with the law for the tax, social security obligation and employment purposes (not including contractual obligations).
- (d) **Protection of vital interests:** the processing is vital to an individual's survival.
- (e) **Public interest:** the processing is necessary for YMCA Norfolk to perform a task that is in the public interest or for its official functions, and the task or function has a clear basis in law.
- (f) **Legitimate interests:** the processing is necessary for YMCA Norfolk's legitimate interests, or the legitimate interests of a third-party, unless there is a good reason to protect the individual's personal data that overrides those legitimate interests.

Article 9 of the UK GDPR details additional specific conditions for the processing of special category data, at least one of which must apply whenever special category data is to be processed.

Data Rights

Your data subject rights are listed below:

- The right of access
- The right to rectification
- The right to erasure or right to be forgotten
- The right to restriction of processing
- The right to be informed
- The right to data portability
- The right to object
- The right not to be subject to a decision based solely on automated processing

Under the Data Protection Act 2018 and the UK GDPR, you may ask for a copy of the information we hold about you and you may request rectifications be made to this information if it is inaccurate or not up to date. You may also ask (in certain circumstances) for all the personal data we hold about you to be deleted. If you want to exercise any of these rights, please write to the Data Protection Officer at dpo@ymcanorfolk.org

What Type Of Personal Data Is Collected?

We collect personal information depending on the nature of our relationship with you, which may include the following:

- Name(s) and address(es), email, phone number(s) and other relevant (e.g., age group, interests, subscriptions, and etc.) personal details and preferred (e.g., activities, events, news, and etc.)
- Staff details relevant to their employment status with us
- Records of donations
- Records of volunteering
- Photographs, recordings (audio and video)
- Information about our relationship with you, correspondence, meeting notes, attendance at events etc
- Occupation, skills and professional activity, network(s) and interests where relevant to our needs
- Financial information (e.g., bank details) where they may be relevant to our needs
- Special category data in specific circumstances

If you contact us, we may keep a record of that correspondence.

We may ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

We will keep details of transactions you carry out and of the fulfilment of your orders.

We may also keep details of your access to our databases or other materials.

To help us improve our services, if you send us personal information which identifies you via email, we may keep your email, your email address and 'screen' name. We may also collect information that is available from your browser.

Further details about what type of personal data we collect about you is provided in the [YMCA Norfolk Data Subject Categories Table](#).

How We Collect Your Personal Data

We collect information if you:

- Submit an enquiry on one of our website forms, one of our events, on in person at our venues
- Join as a supporter
- Former employers
- Identity documentation
- Applying for job vacancies at YMCA Norfolk
- Engage with us on social media
- Visit one of our sites which have CCTV systems operating for the security of clients, customers and staff
- Visit one of our sites that may have photography, recording or filming taking place that may be used for promotional material
- Are referred to one of our services

Further details about how we collect your personal data is provided in the [YMCA Norfolk Data Subject Categories Table](#).

Why We Collect Personal Information

YMCA Norfolk collects and processes your personal data to provide you with access to our services and resources, and to improve our service to you. We may also process your data for other specific purposes if you have granted express consent for its stated purposes. Further details about why we

collect personal information about you is provided in the [YMCA Norfolk Data Subject Categories Table](#).

We may use your data to contact you in order to fulfil a specific service to you. This may include initial phone calls from our advisers and emails informing you about career or membership information, joining or participating in one of our services, or providing information about our nursery, soft play or café services.

You can request for us to stop these forms of communication at any time by contacting our Data Protection Officer.

Who We Share Your Personal Data With

We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements, or to protect the rights, property, or safety of the organisation, or other individuals.

YMCA Norfolk may engage third parties to help us provide you with a service, such as providers of cloud software, mailing houses and independent contractors. YMCA Norfolk has Data Processing Agreements in place with those parties to ensure that they use your personal data in accordance with the UK GDPR and the Act and in line with service requirements.

Further details about who we share your personal data with is provided in the [YMCA Norfolk Data Subject Categories Table](#).

Cookies

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.

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.

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.

For more information about cookies, including how to block or delete them, visit AboutCookies.org.

Third Party Websites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates, this includes our Facebook and Twitter pages. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Protecting Your Personal Data

YMCA Norfolk implements commercially reasonable technical and organisational measures to protect your personal data against abuse and loss. We maintain physical, technical and administrative safeguards to ensure that your data is stored securely, and we update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. We train our employees about the importance of confidentiality and maintaining the privacy and security of your information, committing to take appropriate disciplinary measures to enforce our employees' privacy responsibilities.

The data that we collect from you will be processed at our servers in the UK. It may also be processed by organisations operating in the EEA that YMCA Norfolk has instructed.

If personal data is transferred outside the UK or EEA to a country without a designated adequacy rating, YMCA Norfolk will request the data subject's consent before processing the data. Consent will not be sought where the processor's Binding Corporate Rules, Standard Contractual Clauses or adhoc contractual clauses stipulate that the data will be processed in accordance with the UK GDPR.

How Long We Store Your Personal Data For

We store your personal data in accordance with our Data Protection Policy. This policy is reviewed and updated internally to ensure we do not store your data for longer than is necessary. We also review how and where we store any data to ensure that we meet our obligation to store data securely.

In addition, some of the data we hold may be subject to certain legal and regulatory obligations, which provide a minimum retention period for different types of data. The retention period varies depending on the data we hold.

Changes To This Privacy Notice

YMCA Norfolk reserves the right to vary this privacy notice from time to time. Such variations become effective on posting on our website. We recommend that you regularly revisit this privacy notice to check for any changes.

Complaints

If you wish to make a complaint about YMCA Norfolk, please email info@ymcanorfolk.org. You will hear a response from us within seven working days. If you wish to see our Complaints and Compliments Policy and Procedure, you may request this from the email above.

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 ICO which regulates and enforces data protection law in the UK.

For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>.

Contact details

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate)

YMCA Norfolk Data Subject Categories Table

At YMCA Norfolk we are committed to keeping personal data safe and secure and handling it in accordance with our legal obligations. YMCA Norfolk Data Subject Categories table below shows how as an organisation we achieve this.

YMCA Norfolk Data Subject Categories Table

Data Subject	What is Collected?	How is it Collected?	Why is it Collected?	Who We Share the Data With	Lawful basis(es) of processing	Where we process special category data, additional condition for processing
Job applicants (Employees, Trustees, Volunteers)	• Contact Details • Date of birth • Qualifications, skills and employment history • Nationality and entitlement to work • Equal opportunities monitoring information (anonymised): Ethnic origin, sexual orientation, religion and other special categories of data.	• Application forms • CV's • Identity documentation • Interviews • Other correspondence • Former employers.	• To maintain appropriate records against each applicant. • To comply with legal obligations.	• Employment background check agencies.	• Contract • Legal obligation • Legitimate interests.	• Explicit consent • Employment, social security and social protection (if authorised by law).

YMCA Norfolk Data Subject Categories Table

Data Subject	What is Collected?	How is it Collected?	Why is it Collected?	Who We Share the Data With	Lawful basis(es) of processing	Where we process special category data, additional condition for processing
Current and Former Employees, Workers, Trustees and Volunteers	• Contact Details • Date of birth • Gender • Qualifications, skills & employment history • References • Terms and conditions of employment • Remuneration and benefits • Bank account details • Marital status, next-of-kin • Nationality & entitlement to work • Criminal records • Working patterns • Holiday records • Training Records • Disciplinary and grievance records • Performance assessment records • Health & medical conditions • DBS checks • Equal opportunities monitoring information (anonymised): Ethnic origin, sexual orientation, religion and other special categories of data • Communications.	• Application forms • CV's • Identity documentation • Interviews • Other correspondence • Former employers.	• To enter into an employment contract and maintain appropriate records against such contracts. • To comply with legal obligations.	• Prospective employers • Credit reference agencies • Employment background check agencies • Criminal records check agencies • HMRC • Pension providers • Legal advisors.	• Consent • Contract • Legal obligation • Public task • Legitimate interests.	• Explicit consent • Employment, social security and social protection (if authorised by law) • Legal claims or judicial acts • Health or Social care (with a basis in law).

YMCA Norfolk Data Subject Categories Table

Data Subject	What is Collected?	How is it Collected?	Why is it Collected?	Who We Share the Data With	Lawful basis(es) of processing	Where we process special category data, additional condition for processing
Current and Former Clients: Children	• Contact details • Date of birth • Activity engagement information • Emergency contact details and next-of-kin • Communications • Health and medical conditions • Dietary information and allergies • Nationality and preferred language • Engagement and development records • Gender identity • Photographic images • School attended • Year group at school • Pupil profile and special requirement • Parent health/medical details • Parent nationality • Parent language details • Parent gender identity • Key worker at school contact details • Log in details for parent/carer and student itslearning online platform • Interests.	• Verbally • Written • Email • Referral Forms • Application Forms • INFORM database • Engagement and development records • Registration forms • Iconnect database • CCTV.	• Safeguarding • Reporting to commissioners' demographics etc • Ensuring we are meeting specific targets with commissioned work • Keeping children safe when working with them and being able to contact parents/carers and keyworkers at school • Ensure we know any allergies/dietary • To be passed to teachers for teaching purposes • To make teachers aware of parent issues • Funding claims.	• Employees • Commissioners • Parish Councils • Schools • Local Authority • Teachers • Police (if needed) • Trust Impact • Connect Childcare • External Agencies such as ECFS, Health Visitors.	• Consent (from parent or guardian) • Contract • Legal obligation • Legitimate interests.	• Explicit consent • Employment, social security and social protection (if authorised by law) • Not-for-profit bodies • Legal claims or judicial acts • Reasons of substantial public interest • Health or social care (with a basis in law) • Public health (with a basis in law).

YMCA Norfolk Data Subject Categories Table

Data Subject	What is Collected?	How is it Collected?	Why is it Collected?	Who We Share the Data With	Lawful basis(es) of processing	Where we process special category data, additional condition for processing
Current and Former Clients: Adults	• Contact details • Date of birth • National Insurance Number • Gender identity • Emergency contact details & next of kin • Engagement and development records • Education and employment information • Dietary information & allergies • Nationality and preferred language • Immigration status • Photographic images • Sexual orientation • Ethnic origin • Religious beliefs • Health and medical information.	• Verbally • Written • Email • Referral Forms • Application Forms • INFORM database • CCTV.	• Safeguarding • Ensure we know any allergies/dietary • Reporting to commissioners' demographics etc • Ensuring we are meeting specific targets with commissioned work • Keeping adults safe when working with them and being able to contact parents.	• Employees • Commissioners • Parish Councils • Schools • Local Authority.	• Consent • Contract • Legal obligation • Legitimate interests.	• Explicit consent • Employment, social security and social protection (if authorised by law) • Not-for-profit bodies • Legal claims or judicial acts • Reasons of substantial public interest • Health or social care (with a basis in law) • Public health (with a basis in law).
Customers	• Contact details • Account information, including previous bookings and sales • Bank account details • Communications.	• Application forms • Online booking system.	• To enter into a sale agreement • To process payments • To organise bookings • To maintain appropriate financial records • For marketing purposes.	N/A	• Consent • Legitimate interests.	N/A

YMCA Norfolk Data Subject Categories Table

Data Subject	What is Collected?	How is it Collected?	Why is it Collected?	Who We Share the Data With	Lawful basis(es) of processing	Where we process special category data, additional condition for processing
Contractors and agency workers	• Contact details • Accreditations and professional qualifications (including QTS number) • Bank account details • Date of birth • Next of kin contact details • National Insurance Number • Current employment (school/retired) • Experience • Subjects/key stage they teach • Safeguarding/Lone Worker training • Log in details for itslearning online platform • Disclosure and Barring Service (DBS) • Identification • Nationality and entitlement to work information.	• HR processing requirements • Email • Verbally • Hard paper copies • Agency Booking Confirmations.	• Ensure we are compliant with our tenders / workers working with children are qualified • Ensure that we have the right info for safeguarding/DBS process • Ensure that our staff are qualified to the status they tell us • To check teachers are not barred from teaching or not registered as teachers • For auditing by Norwich City Council • To pay self-employed teachers • Policies.	• Commissioners if requested as part of a project • DBS service • Teacher Qualification Unit service • Finance Department at YMCA Norfolk.	• Consent • Contract • Legal obligation • Public task • Legitimate interests.	• Explicit consent • Made public by the data subject • Legal claims or judicial acts • Reasons of substantial public interest (with a basis in law) • Public health (with a basis in law).

YMCA Norfolk Data Subject Categories Table

Data Subject	What is Collected?	How is it Collected?	Why is it Collected?	Who We Share the Data With	Lawful basis(es) of processing	Where we process special category data, additional condition for processing
Supporters	• Contact details • Donation information • Bank account details • Attendance at events/other activities • Communications • Communication preferences • Photographic images • Gender identity • Personal information • Social media profiles • Date of birth • Occupation • Link/relationship to other organisations • Introducer • Disclosure and Barring Service (DBS) – expiry date/volunteer hours.	• Correspondence • Email • Communications • Forms submitted through our website • Donations received via Donorbox • Donations via Cheque • Donations via Just Giving • Website registration for events • Stripe – Banking System • Social Media – People leave phone numbers etc • In person – at events.	• For processing a donation • sending information about our work and how you can continue to support YMCA • sending communications to subscribed supporters • Responding to correspondence from supporters • Making supporters aware of events that they can support • Maintaining databases of supporters and volunteers • Helping us monitor ongoing consent for information • For marketing purposes.	N/A	• Consent • Contract • Legitimate interests.	• Explicit consent • Not-for-profit bodies.