

# 1ST TWYFORD SCOUT GROUP

## privacy policy

### Contents

- [Scouts: who we are and what we do](#)
- [Information on this policy](#)
- [Understanding your rights](#)
- [Why we collect and use personal data](#)
- [The Information that we collect](#)
- [How and when we collect information about you](#)
- [Our legal basis for processing your information](#)
- [How we work with third Parties in processing personal data](#)
- [How long we keep your data for](#)
- [How we keep your information secure](#)
- [Where we keep your information](#)
- [How to control the marketing that we send you](#)
- [How we use your information if you apply for a role at Scouts](#)
- [Changes to this Policy](#)

# Scouts: who we are and what we do

We are part of the Scouts and aim to provide a wide range of activities to help develop character and social skills for boys and girls in the Twyford area.

We are a registered charity number 269687 (England and Wales). As a not for profit charity we are not required to register with the Information Commissioner's Office.

## Information on this policy

Your personal information (such as your name and contact details, known as 'personal data') is protected by specific legislation:

- Until 25 May 2018: The Data Protection Act 1998
- 25 May 2018 onwards: General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)
- Privacy and Electronic Communications (EC Directive) 2003

The laws in this area continue to develop quickly. We take our responsibilities around data very seriously, and it's important to us that you understand how and why we ask for and work with your details. Your privacy is important to us and we have policies to ensure that we collect only the data that we need to carry out our business, and that we don't keep it any longer than we need to.

At Twyford Scouts, everything we do is geared towards providing a wide range of activities to help develop character and social skills for boys and girls in the Twyford area.

This policy explains how we collect, manage, use and protect your personal data, including how we work with third parties.

We never sell or swap your details with any other organisation for their marketing purposes.

If you would like more information on anything in this policy, please do get in touch with us.

Our Data Protection Officers are Beavers -Jane Moore, Cubs – Tom Toy, Scouts – Phil Hayes.

## Understanding your rights

It is important that you understand your legal rights around your personal data and how we may use it. If you would like to discuss or exercise any of these rights, please do get in touch us.

### Right to be informed

This Privacy Policy ensures that you are informed about how we will process your personal data. You might also see messages on some of our forms (or otherwise when we collect personal data from you) that explain why we ask for specific pieces of information from you.

### Right of access

You have the right to access a copy of your personal data and receive certain information about what the data is and how and why we are processing it. Please note that we will require you to prove your identity before we disclose any information.

### Right to rectification

If you feel that any of the information that we hold about you is incorrect, do let us know so that we can look into it.

## Right to object

You have the right to object to the processing that we have outlined in this policy.

## Right to erasure / to be forgotten

You have the right to request that we delete your information and can discuss this with us at any time.

You should know that there are some circumstances where we may need to keep your details, for example, if it is necessary to comply with a legal obligation on us. If this situation occurs, then we will explain and discuss these circumstances with you.

## Right to restrict processing

You can request that we restrict processing of your data, as an alternative to deleting it – this means that we will keep the data but stop processing for most purposes. You may want to exercise this right if you feel that the data is inaccurate, that our processing of it is unlawful, whilst we progress a request from you to object to processing, or if we have no further need of the data, but you require us to keep it in relation to the establishment, exercise or defence of a legal claim.

## Rights related to automated decision making

You have rights to avoid being subject to decisions based solely on automated processing (including profiling) which has a significant effect on you. At Scouts we do not carry out any such processing.

## Right to data portability

You have the right to request a copy of certain personal data to have it transferred to another organisation in certain circumstances.

You should know that there are some circumstances where these rights may not apply, but where this is the case we will always explain this to you. Please do contact us if you have any questions or concerns on how we collect and use your personal data, or on your rights, as we are always happy to speak to you.

## Why we collect and use personal data

We collect personal data to help us to process your requests, keep in touch with you and to help us to interact with you in the most effective way.

Examples of why we process your personal data include:

- To keep you updated on the Scouting calendar
- To make sure you know about events that you can participate in as a Scouts supporter;
- To invite you to participate in campaigns;
- To send you fundraising appeals;
- To support you as a volunteer;
- To process donations or other payments, and verify financial transactions to protect you from fraud;
- To process Gift Aid donations and Gift Aid Declarations;
- To check with you on how you want us to contact you, and record these preferences;
- To keep notes of conversations that you have with our team, as a reference if you want to revisit the conversation later;
- To notify you of changes to our policies when these affect you;

- If we need to do so to comply with a law, process or regulatory requirement;
- To process a volunteer application you may make with us.

You can find more information on the specific information that we will collect and hold about you if you are applying for as a volunteer. Please ask for details.

## The information that we collect

The personal data that we collect about you will be based on how you interact with us, but we collect the following information from many of our supporters:

- Your name;
- Your postal and email addresses;
- Your telephone number or numbers;
- Details of any correspondence that we have had with you.
- Details of any donations that you have made to us;
- Whether or not you have signed up to the Gift Aid Scheme, and when you did so;
- Your child's, young person's details including date of birth, address, emergency contacts and any medical history we need to be aware of, so we can fulfil our duty of care;
- Events that you have taken part in or enquired about.

There is also other information that we may collect and hold in specific circumstances. For example:

- Your bank account details if you set up a direct debit with us;
- Health information that you give us if you are participating in an event, to help us to ensure your safety;
- Campaigning actions that you have taken on our behalf;
- If you are a volunteer and have told us that you have a specific area of interest to receive training on.

## Sensitive data

Some personal data is legally considered to be sensitive, and so is subject to additional safeguards – in data protection law this is known as "special category" data. Data on the following matters is classed in this way:

- Race;
- Ethnic origin;
- Political opinions;
- Religion or philosophical beliefs;
- Trade union membership;
- Genetics;
- Biometrics (where this is used for identification purposes);
- Health;
- An individual's sex life; or
- Sexual orientation

Similar protections apply to personal data relating to criminal convictions and offences.

**As a charity we only need any medical history that will enable us to fulfil our duty of care. We do not collect other sensitive data.**

Age is not legally considered as a special category of data, but we will always treat it sensitively.

## How and when we collect information about you

There are a number of ways that we collect information; most often this will be directly from you, for example, if you fill out a form on our website, or directly with one of our leaders. Whenever we ask for information from you we will explain why we are asking for it (including by reference to this policy), and you will always be given a choice about how we communicate with you.

We do not buy lists of data to use for our marketing purposes or share data with other charities for them to use in their marketing purposes.

## Our legal basis for processing your information

We will always make sure that we consider why we are processing your personal data and identify our legal basis for doing so. Often this will be because you have given us your consent. We may also process your data where we are furthering our legitimate aims and have assessed that the processing is not likely to be too intrusive, or to unduly infringe on your rights and freedoms. In legal terms, this is called the “legitimate interests” basis.

In some cases, we have a legal or statutory duty to process information, and we will always comply with any legal requirement.

We may also process your personal data where it is necessary to carry out the terms of a contract which we have with you (or when we are in the process of forming that contract with you).

## Marketing communications

We do not do marketing communications. However, we will let you know of any events we are planning by posting details on our website, sending you an e-mail or briefing young people at their Scouting session.

## Processing your data on the basis of your consent:

When you give your consent for us to contact you, we do not treat this as valid indefinitely. However, we understand that our supporters want to continue to hear from us whilst they have an active relationship with us, and for a period afterwards.

Here are some examples of what we mean by an active relationship:

- Your child/young person is enrolled with us or on the waiting list.
- If you make a donation or sponsorship payment to us, including regular monthly gifts
- If you participate in an event on our behalf (for example Ride London or the London Marathon)
- If you take a campaigns action for us, such as signing a petition

We will consider your consent to be valid whilst you take these actions. You can withdraw your consent at any time. If you wish to do so, or have any questions on this, please do just get in touch us.

## The Legitimate Interests basis

We have a duty to The Scout Association and to provide a wide range of activities to help develop character and social skills for boys and girls in the Twyford area; to responsibly raise as much money as possible to further our charitable aims; to update our supporters and the general public on our progress; and to operate in an effective way. We always pursue these interests in a respectful manner, with our supporters at the heart of what we do.

You have the right to object to us processing your data on the grounds of our legitimate interests. If you would like us to stop using your data on this basis, please do get in touch with us.

## Administrative messages

There are some administrative messages that we legally must share with you, which are not affected by how you have told us you would like us to contact you for marketing purposes.

Examples of these include:

- Confirming the details of any direct debit that you set up with us, including your bank account and payment details;
- Confirming where you have made a Gift Aid Declaration orally, so that we can give you the information on the tax implications of this;
- Collection of subscriptions due.

## How we work with third parties in processing personal data

At Scouts, we sometimes work with third parties. It's important that you understand the circumstances where this might happen, and who we work with.

We never sell or swap your details with any other organisation for their marketing purposes.

Typically, our work with third parties will be for an event where a third party is providing instruction or facilities. The data processing by the third party being limited to their receiving an attendance list for health and safety purposes (this would include any medical conditions that might affect the activity).

## Third party suppliers

We do not, as a rule, use third party suppliers (The Scout Association being deemed a related party) and where we do will hold them to the same level of responsibility for your data.

## Social media

We do not sponsor the use of social media.

## Where we have a legal requirement

We will always share data where we have a legal requirement to do so. Examples of this include providing audit information to HMRC for our Gift Aid claims or if we are required to do so by law enforcement officials.

## How long we keep your data for

We want to make sure that we have up to date records for as long as you are actively supporting Scouts, so for as long as you take actions on our behalf or to engage with us, such as participate in our campaigns, donate to us or correspond with us. Once you are no longer an active

supporter, we will remove any personal details from our records of you, to ensure that any information is entirely anonymous.

In general, we will keep records of financial donors for at least two years, to meet our requirements for any Gift Aid audit from HMRC. If we have asked for sensitive personal data specific to an event, we will dispose of this data within a month after the event.

You can find more detailed information on how long we keep your data for, and other timescales that might apply below.

In most cases we will keep records for two years after you last make a donation to us. This ensures that we keep the information we need for any financial audit (including Gift Aid audits).

If you are a volunteer who works with young people then we will keep this data for as long as we are required to fulfil our safeguarding responsibilities.

## What happens at the end of this time period?

At the end of this time period, we will remove your personal details from our records, to ensure that they are entirely anonymous.

## Your right to be forgotten

You have a right to be forgotten, which means that you can ask us to delete your personal details before the end of the time limits we've listed in the table above. You should know that there are some circumstances where we may need to keep your details, for example, in order to comply with a legal obligation. If this situation occurs then we will explain and discuss these circumstances with you.

If you would like to discuss or exercise this right, please do get in touch with us.

## How we keep your information secure

We take the care of your data very seriously and we use a combination of organisational and technological security measures to protect your personal information to the highest possible standards. This includes the use of secure servers, firewalls, virus & malware protection, secure socket layer (SSL) encryption and secure file transfer protocol for our work with third parties. We follow payment card industry (PCI) security compliance guidelines when processing credit card payments.

Access to all Scouts data is protected by passwords, including letters, numbers and characters: in some cases more than one method of authentication is used. We make sure that only staff who need to access your personal data can do so. Any member of our staff who has access to your personal data is given training to make sure that they understand the importance of keeping your information safe and secure at all times.

Whilst we take all of the measures that we've outlined above, unfortunately, the transmission of information using the internet is not completely secure. Although we will do our best to protect your personal data sent to us this way, we cannot guarantee the security of data transmitted to our site.

In the extremely unlikely event that we experience a data breach, our Data Officers would immediately work with the Committee and The Scout Association.

## How to control the marketing that we send you

We do not do marketing, but if you have an issue with what we are communicating, please contact us.

We will ensure that our records are updated as soon as possible once we receive your instructions.

### Administrative messages

There are some administrative messages that we legally must share with you, which are not affected by how you have told us you would like us to contact you for marketing materials.

Examples of these are:

- Confirming the details of any direct debit that you set up with us, including your bank account and payment details;
- Confirming where you have made a Gift Aid Declaration orally, so that we can give you the information on the tax implications of this.

If we send you one of these messages, we will only use it to share the detail that we have to legally provide you with and will not use it for marketing.

## Information on profiling

We do not profile.

## How we use your information if you apply for a role at Scouts

We collect information from anyone who applies to volunteer at Scouts. This information is entirely separate to our supporter data. As an applicant, you are entitled to the same rights as our supporters, and these are outlined in our Rights section.

### Applicants

When you apply to work or volunteer at Scouts we will ask you to complete a DBS application.

We will keep volunteer information is kept for as long as required by our safeguarding duties.

## Changes to this Policy

This policy was last updated in February 2019

From time to time, we may make changes to this Policy and you will always be able to see here when it was last updated. If we make significant changes, such as in how or why we process your personal data, we will also publicise these changes on our website or may contact you directly with more information.

Please do revisit this policy each time you consider giving your personal data to Scouts.