

# Cathays and Central Youth & Community Project (CCYCP) General Data Protection Regulation (GDPR) Policy

## Purpose

This is CCYCP's statement of intent regarding GDPR. Everyone who works for, or on behalf of the organisation, has a responsibility for ensuring data is collected, stored and handled appropriately, in line with the principles outlined in this policy.

## Legal Requirement

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- (a) **Your consent (you are able to remove your consent at any time).** You can do this by contacting us by email at email [@cathays.org.uk](mailto:@cathays.org.uk) or by writing to us at Cathays and Central Youth & Community Project, Cathays, Cardiff, CF24 4HX
- (b) **We have a legal obligation.**
- (c) **We have a vital interest.**
- (e) **We need it to perform a public task.**
- (f) **We have a legitimate interest.**

We will not use your personal data for any unrelated purpose, without informing you prior to this, and only within the legal basis that we rely on for processing it.

## General Commitments

There are six data protection principles that we will apply when processing personal data:

- We will process personal data lawfully, fairly and in a transparent manner;
- We will collect personal data for specified, explicit and legitimate purposes only, and will not process it in a way that is incompatible with those legitimate purposes;
- We will only process the personal data that is adequate, relevant and necessary for the relevant purposes;
- We will keep accurate and up-to-date personal data, and take reasonable steps to ensure that inaccurate personal data is deleted or corrected without delay;
- We will keep personal data for no longer than is necessary for the purposes for which the information is processed;
- We will take appropriate technical and organisational measures to ensure that personal data is kept secure and protected against unauthorised or unlawful processing, and against accidental loss, destruction or damage.

Everyone who works for, or on behalf of the organisation, has a responsibility for ensuring data is collected, stored and handled appropriately, in line with the principles outlined in this policy.

## Collecting, storing and securing your personal data

### **How we define personal data**

Personal data means information that relates to a person who can be identified from that data on its own, or when taken together with other information which is likely to come into our possession. Personal data includes any expression of opinion about the person and an indication of intentions of us or others in respect of that person. It applies to data stored electronically and physically, but does not include anonymised data.

### **The type of personal data we collect**

We currently collect and process the following data:

- Stock Data (names, addresses etc.)
- Contact Data (email addresses, telephone numbers etc.)
- Content Data (pictures & videos)
- Special Category Data (concerning racial or ethnic origin, health & sexual orientation)

Personal data may be shared with other parties, including relevant affiliated organisations, external contractors and our professional advisers (e.g. legal and financial advisors), HR advisors and payroll providers. The recipient of the personal data will be bound by obligations of confidentiality, ensuring that all data is dealt with in a secure manner, and shared only with necessary individuals/organisations to comply with the law. We seek to ensure that our personal data collection and processing is always proportionate, and we will not collect any data that is not deemed necessary. We will notify any individual in writing of any material changes to the personal data we collect from them or to the purposes for which we collect and process it.

### **How we access personal data and why**

Most of the personal data we process is provided to us directly by you for one of the following reasons:

- You have accessed a service as a customer (such as a room booking) or have attended a provision (such as a youth club).
- You have joined the organisation as a volunteer, member or staff member.
- You have filled out one of our online forms (e.g. enquiring about room / equipment hire).
- You have sent us correspondence (by email or post).

We also receive personal data indirectly, from the following sources in the following scenarios:

- Local authorities may pass on information regarding service users who are being referred to our services (youth and community provisions).

We use the data that you have given us in order to keep an accurate record of the services we provide, including how they are utilised, and to ensure the smooth and lawful running of the organisation.

We may share this data with other organisations/individuals, only when absolutely necessary or lawfully required, and these parties will also be required to hold and process data legally and confidentially.

## **How we store your personal data**

Personal data may be held at our offices and third-party agencies, service providers, representatives and agents as described above and in cloud-based IT services. In the event that we use cloud-based IT services, personal data may be transferred internationally to other countries around the world, including countries that do not have data protection laws equivalent to those in the UK. We have security measures in place to seek to ensure that there is appropriate security for personal data we hold.

We keep your personal data for as long as is reasonably and lawfully necessary by the organisation. This includes during and after your employment and, in the majority of cases, for no more than 6 years after the end of your employment. We will then dispose your data by removing it from our system and destroying any hard copies of information that is no longer required. Examples of data retention periods used by CCYCP include:

- 2 years – review or destroy: data of a generally low or short-term value (i.e. relating to general administration).
- 6 years – review or destroy: data that must be retained by law or for audit/compliance purposes (e.g. personal data relating to finance, commercial activities, facilities management and information management).
- 10+ years – review or destroy: data that holds long-term value to the organisation or is required to be retained by law for longer periods of time. Some data may be of historical value and may be preserved permanently (this type of data is unlikely to be personal value - any personal data will be retained only with permission of the individual it relates to). Examples include those relating to governance or of the history of the organisation.

## Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing personal data will do so only in an authorised manner and are subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of any suspected data security breach in the unfortunate event that this should occur.

## Your Rights

Under data protection law, you have certain rights, including the following:

**Your right of access** - You have the right to ask for copies of your personal data, referred to as a Subject Access Request (SAR).

**Your right to rectification** - You have the right to ask for any inaccurate personal data to be rectified. You also have the right to ask us to complete any data you believe is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data.

**Your right to restriction of processing** - You have the right to ask for the restriction of processing of your personal data.

**Your right to object to processing** - You have the the right to object to the processing of your personal data.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. However, there may be some administrative costs involved, depending on the nature of your request. If you make a request, we are required to respond within one month.

Please contact us by email at [dataprotection@cathays.org.uk](mailto:dataprotection@cathays.org.uk), or write to us at Cathays and Central Youth & Community Project, Cathays, Cardiff, CF24 4HX, if you wish to make a request.

## Operation, Monitoring, Review, and Complaints

### Complaints

If you have any concerns about our use of your personal data, you can make a complaint to us by email at [dataprotection@cathays.org.uk](mailto:dataprotection@cathays.org.uk), or write to us at Cathays and Central Youth & Community Project, Cathays, Cardiff, CF24 4HX.

You can also complain to the ICO if you are unhappy with how we have used your data:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline: 0303 123 1113

ICO website: <https://www.ico.org.uk>