

# PRIVACY POLICY YOUNG PEOPLE



We care about your privacy! Here's what you need to know about why we collect some of your information and how we keep it safe. This means we only use your details to make sure you get the most out of our programmes, and we promise never to share it without your permission. You can always ask us to change or delete any info we have about you – just let us know!

This document explains your rights when it comes to your personal data and how you can contact us.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the UK General Data Protection Regulation (UK GDPR).

## KEY TERMS

It would be helpful to start by explaining some key terms used in this policy:

|                                       |  |
|---------------------------------------|--|
| <b>We, us, our</b>                    | This means "Youth Leads UK" or "Youth Leads" – the organisation running the programmes you'll be part of.  |
| <b>Personal data</b>                  | This is any information that's about you, like your name, contact details, or date of birth.   |
| <b>Special category personal data</b> | This is more sensitive information about you, such as your health, ethnicity, race or religion.  |
| <b>Data subject</b>                   | That's you! The person who's joining our programmes.   |
| <b>Services</b>                       | All the activities, projects, and opportunities Youth Leads UK offers to help young people, like volunteering, skills workshops, or getting your voice heard by decision-makers. |

## PERSONAL DATA WE COLLECT ABOUT YOU

We collect different bits of information to make sure we can support you properly in our programmes.

### Here's what we might ask for:

- **Your basic info:** Your name, address, email, and phone number.

- **Your date of birth:** So we know your age and make sure you're in the right group.
- **Your pronouns and gender** (if you want to share this with us).
- **Special information:** With your permission, we might ask about your race, ethnicity, religion, or any health details (like medications, disabilities, or things we need to help support you).
- **Photos and videos:** We might take pictures or videos of you while you're with us.
- **If you're under 18:** We'll also collect contact details for your parent or guardian.
- **Your background:** This could include your school name, what type of school you attended, and whether you got free school meals.
- **Work experience:** If you have or had a job, we might ask about it.
- **Family information:** Sometimes, we might ask about your family, like if you have children or what job your parents do.

We collect and use this information to make sure we can support you in the best way possible, as explained in the 'How and why we use your personal data' section below. If you don't give us the info we need, it might slow things down or stop us from offering you our programmes and services.

## HOW YOUR PERSONAL DATA IS COLLECTED

We usually collect your information directly from you when you:

- Fill in our Programme Sign-Up form
- Chat with us in person, over the phone, by text, or email
- Use our website

Sometimes, we might get your information from other places, like:

- **Public sources:** Information that's already available online
- **Your school:** But only if you've given us permission
- **Our website cookies:** Small bits of data that help us understand how you're using our site
- **Our systems:** Like when you use door entry systems, reception sign-ins, or CCTV when visiting us

## HOW AND WHY WE USE YOUR PERSONAL DATA

The law says that we can only use your information when we have a good reason. Here's why we might use it:

- **With your consent:** If you say it's okay.
- **To follow the law:** Sometimes, we need to use your info to stick to legal rules.
- **To offer you our programmes:** We need your info to make sure you can take part in our activities which is our 'contract' with you.
- **For our organisation's needs:** To make sure we run things smoothly, but we'll always respect your rights.

The table below explains what we use your personal data for and why.

| What we use your personal data for  | Our reasons  |
|---|--|
| Providing services to you as part of our programmes and initiatives   | To provide you with our programmes and support, or to help you get started if you've asked to join.  |
| Preventing and detecting fraud against you or us  | To make sure everything stays safe and fair for everyone.  |
| Following the law   | Sometimes we have to use your info to stick to legal rules or to protect our business, interests and rights.   |
| Gathering and providing information to official organisations who regulate us   | To follow the laws and rules we have to stick to.  |
| Improving our services  | To make our programmes better and give you the best experience.  |
| To look at the data and understand who our participants are, so we can improve our programmes and support you better.   | To make our programmes better and give you the best experience.  |
| Keeping our systems safe  | Depending on the situation: <ul style="list-style-type: none"> <li>● To protect you and us from any illegal activity</li> <li>● Or to follow the laws and rules we need to.</li> </ul> |
| Updating your details   | So we always have the right contact info for you.  |
| To provide required reports, like our Annual Report, as part of our legal responsibilities.   | So we stick to the laws and rules that we have to.   |
| Sharing information about our programmes with: <ul style="list-style-type: none"> <li>● Current and past participants</li> <li>● People or groups who've shown interest in us before</li> <li>● New people or organisations who might be interested.</li> </ul> | For promotion and marketing purposes.  |

## HOW AND WHY WE USE YOUR PERSONAL DATA—IN MORE DETAIL

More details about how we use your personal data and why are set out in the table below.

| Purpose   | Lawful basis relied on under the UK GDPR  | Relevant categories of personal data  |
|---|---|---|
| Communications with you not related to marketing, including about changes to our terms or policies or changes to the services or other important notices (other than those addressed above) | <p>Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(c))</p> <p>To perform our contract with you or to take steps at your request before entering into a contract (Article 6(1)(b))</p> <p>Where you have given your consent (Article 6(1)(a))</p> | —your name, address and contact information, including email address and telephone number   |
|   | Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you   | —your name, address and contact information, including email address and telephone number [and company details]   |
| To ensure that participants receive proper care in the event of an emergency and to ensure that our services and facilities are adequately designed to meet the needs of all participants   | Where you have given your explicit consent (Article 9(2)(a))  | -your pronouns, gender, ethnicity, religion, health information (including information about medications, disabilities, access needs, and necessary accommodations) |
| Marketing communications to third parties   | Where you have given your consent (Article 6(1)(a))   | -photographs and videos of you  |
| Collecting parental/guardian consent where a participant is younger than 18   | <p>To perform our contract with you or to take steps at your request before entering into a contract (Article 6(1)(b))</p> <p>Processing is necessary for compliance with a legal obligation to which we are subject (Article 6(1)(b))</p>  | -parents'/guardians' name, address, email address, and phone number   |
| Emergency Contact Information   | Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you   | -Emergency contact's name, phone number, and relationship to participant  |

| Purpose   | Lawful basis relied on under the UK GDPR   | Relevant categories of personal data  |
|---|--|---|
|   | Necessity of protecting the vital interests of a data subject or other natural person (Article 6(1)(d))  |   |
| Understand participants' educational background and any applicable learning difficulties to ensure the quality of the service we provide to participants and that all participants have the necessary support | To perform our contract with you or to take steps at your request before entering into a contract (Article 6(1)(b))<br><br>Our legitimate interests (Article 6(1)(f)), which is to be as efficient as we can so we can deliver the best service to you | -any learning difficulties, where you went to school, what type of school you attended, eligibility for free school meals, literacy and numeracy skills, employment status, employment history, parents' employment history |

## HOW AND WHY WE USE YOUR PERSONAL DATA—SPECIAL CATEGORY PERSONAL DATA

Some of the information we collect is extra sensitive, like your race, ethnicity, religion, or health details. Because this is more private, there are special rules to keep it safe. We'll only use this information if:

- You've clearly said it's okay
- It's really important to protect you or someone else if they can't give permission themselves.

The wording below is the 'legal' wording we need to share with you.

Certain personal data we collect is treated as a special category to which additional protections apply under data protection law:

- personal data revealing racial or ethnic origin, religious beliefs
- data concerning health.

Where we process special category personal data, we will also ensure we are permitted to do so under data protection laws, eg:

- we have your explicit consent;
- processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

## MARKETING

We will use your personal data to send you updates (by email, text message, telephone or post) about our programmes and initiatives.

You do, however, have the right to opt out of receiving marketing communications at any time by:

- contacting us;
- using the 'unsubscribe' link in emails or 'STOP' number in texts.

We will always treat your personal data with the utmost respect and never sell OR share it with other organisations for marketing purposes.

## WHO WE SHARE YOUR PERSONAL DATA WITH

We sometimes share your information with:

- Other companies that help us run our programmes
- Services that help us manage things like emails or storing data

We only share your info with these organisations if we're sure they'll keep it safe.

We might also share your info with:

- People who check our finances (auditors), but they have to keep your details private
- Our advisors, like lawyers, who also have to keep your details private
- Law enforcement, courts, or official organisations if we're required to by law

## WHERE YOUR PERSONAL DATA IS HELD

Personal data may be held at our offices and those of our third party agencies, service providers, representatives and agents as described above (see above: 'Who we share your personal data with').

Some of these third parties may be based outside the UK. For more information, including on how we safeguard your personal data when this happens, see below: 'Transferring your personal data out of the UK'.

## HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will not keep your personal data for longer than we need it for the purpose for which it is used.

If you are no longer part of our programmes or initiatives, we will usually delete or anonymise your account data after two years. Please keep in mind that in case you become part of our Alumni, your relevant personal information (such as name, address and contact

details) might be kept for a longer period, and as long as necessary. Other participant information may be retained for longer periods, but it will be properly anonymised and preserved solely for archival records.

Following the end of the relevant retention period, we will delete or anonymise your personal data.

## TRANSFERRING YOUR PERSONAL DATA OUT OF THE UK

Sometimes, we might need to send your information to countries outside the UK. If we do, we'll always follow UK laws to keep your data safe.

This might happen if:

- Our service providers are based in another country.

We'll only transfer your information if:

- The UK government says that country has strong data protection rules.
- There are proper protections to keep your data safe.
- There's a special reason allowed by data protection laws.

Where we transfer your personal data outside the UK, we do so on the basis of an adequacy regulation or (where this is not available) under legally-approved standard data protection clauses recognised or issued further to Article 46(2) of the UK GDPR. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK unless we can do so on the basis of an alternative mechanism or exception provided by UK data protection law and reflected in an update to this policy.

Any changes to the destinations to which we send personal data or in the transfer mechanisms we rely on to transfer personal data internationally will be notified to you in accordance with the section on 'Changes to this privacy policy' below.

## YOUR RIGHTS

You have the following rights, which you can exercise free of charge:

|                      |   |
|----------------------|---|
| <b>Access</b>        | The right to be provided with a copy of your personal data            |
| <b>Rectification</b> | The right to require us to correct any mistakes in your personal data |

|  |  |
|--|--|
| <b>Erasure (also known as the right to be forgotten)</b>         | The right to require us to delete your personal data—in certain situations   |
| <b>Restriction of processing</b>                                 | The right to require us to restrict processing of your personal data in certain circumstances, eg if you contest the accuracy of the data  |
| <b>Data portability</b>  | The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations   |
| <b>To object</b>   | The right to object:<br>—at any time to your personal data being processed for direct marketing (including profiling);<br>—in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests unless there are compelling legitimate grounds for the processing to continue or the processing is required for the establishment, exercise or defence of legal claims |
| <b>Not to be subject to automated individual decision making</b> | The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you   |
| <b>The right to withdraw consent</b>                             | If you have provided us with a consent to use your personal data you have a right to withdraw that consent easily at any time<br><br>You may withdraw consent by contacting Saeed Atcha by email at <a href="mailto:saeed@youthleads.uk">saeed@youthleads.uk</a><br><br>Withdrawing consent will not affect the lawfulness of our use of your personal data in reliance on that consent before it was withdrawn  |

For more information on each of those rights, including the circumstances in which they apply, please contact us (see ‘How to contact us’ below) or see the Guidance from the UK Information Commissioner’s Office (ICO).

If you would like to exercise any of those rights, please:

- email, call or write to us—see below: ‘How to contact us’; and
- provide enough information to identify yourself and any additional identity information we may reasonably request from you;
- let us know what right you want to exercise and the information to which your request relates.



## KEEPING YOUR PERSONAL DATA SECURE

We have appropriate security measures to prevent personal data from being lost accidentally, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information on how to protect your personal data and other information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit [www.getsafeonline.org](http://www.getsafeonline.org). Get Safe Online is supported by HM Government and leading businesses.

## HOW TO COMPLAIN

Please contact us if you have any queries or concerns about our use of your personal data (see below 'How to contact us'). We hope we will be able to resolve any issues you may have.

You may also have the right to lodge a complaint with the Information Commissioner (the UK data protection regulator).

## CHANGES TO THIS PRIVACY POLICY

This privacy notice was published on 24 September 2024 and last updated on 24 September 2024.

We may change this privacy notice from time to time—when we do we will inform you via email.

## UPDATING YOUR PERSONAL DATA

We take reasonable steps to ensure your personal data remains accurate and up to date. To help us with this, please let us know if any of the personal data you have provided to us has changed, eg your surname or address—see below 'How to contact us'.

## HOW TO CONTACT US

You can contact us by post or email if you have any questions about this privacy policy or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

| <b>Our contact details</b>  |
|---|
| <p data-bbox="220 383 687 416"><i>Youth Leads UK</i>   <a href="https://youthleads.uk">https://youthleads.uk</a></p> <p data-bbox="220 450 791 517"><i>Youth Leads UK, Arrive Blue, Blue, Media City UK, Salford, M50 2ST</i></p> <p data-bbox="220 551 459 584">info@youthleads.uk</p> |