Malvern Youth and Community Trust (MYCT)

Data Protection Policy and Privacy Statement

Reviewed	September 2023
Approved	September 2023
Next Review	September 2025

Principle

Malvern Youth and Community Trust (MYCT) acknowledges and commits itself to the principles and requirements of the General Data Protection Regulations (GDPR), namely that individuals' personal data will be:

a) collected and processed for defined, explicit and legitimate purposes, and not further processed for purposes outside that definition

b) appropriate, relevant and limited to those purposes

c) accurate and up-to-date, with any inaccuracies promptly corrected

d) held securely, and protected from access by anyone other than those legitimately employed to process it

e) stored for as long as the purpose for which it was collected remains current and, save for financial records, a maximum of 5 years from the time of its last use, or any other period required by law.

MYCT, as the Data Controller, will not only reflect these principles in its policy and procedures, but also declare that an individual will have both the option to view and amend their data, and the right to have their data removed once the purpose for which it was gathered has ceased, subject to compliance with any relevant legislation.

Definitions

Data

Information that can be linked to a specific individual by some means.

Data Subject

The term used in the GDPR legislation for the specific individual to which a piece or pieces of data can be linked.

Data Controller

The organisation that collects data to enable it to function, and if necessary, selects and manages external organisations or individuals to process it.

Data Processor

An external organisation or individual selected and managed by the Data Controller to process the data, to enable the Controller to carry out its day-to-day functions.

Data Privacy Statement

A statement that sets out MYCT's position on protecting the privacy of any individual whose data it collects, and the rights that individuals have in accessing, amending or deleting the data that MYCT holds on them, including the right to be forgotten.

Policy

MYCT, as the Data Controller, will exercise effective control and use of personal and sensitive data in line with the specified purposes set out in a Data Privacy Statement available to all its Data Subjects.

To demonstrate compliance with legislation and exercise effective control of individuals' personal data, MYCT will:

1. Ensure that the Centre Manager, and any others within MYCT who may handle such data, are fully aware of their responsibilities regarding its collection, storage and use.
2. Ensure that the Centre Manager, and any others collecting personal data, select and manage appropriate Data Processors where necessary, and that security measures are in place to protect the data from access by anyone other than the designated Data Processors.
3. Make available a Data Privacy Statement to all Data Subjects, via the Malvern Cube website. This Statement will include:
    a. the data MYCT collects and processes, and the purposes for which it is processed
    b. individuals' rights regarding access to and ability to amend or remove their data
4. Inform all data subjects that MYCT needs their express agreement to receive marketing and promotional communications from the Cube
5. Include on the Malvern Cube website and ticket booking system an opt-in invitation to receive marketing and promotional communications from the Cube

6. Ensure all users of the Cube are aware that CCTV is installed for security purposes, and that processing and retention of images is clearly described in a procedure that is available on request
7. Delegate the Centre Manager to inform the ICO in the event of a data breach.
8.

Reviewed	21.09.2023
Approved	
Next Review	annually

Data Privacy Statement

Malvern Youth and Community Trust (Malvern Cube) will collect, hold and process only sufficient personal data to allow us to manage your involvement with us. We will destroy data once it has been used for its intended purpose.

The Centre Manager is the point contact for any matters relating to our handling of your personal data.

This data will generally consist only of basic contact detail (name, address, phone number, email address) stored on one or more of our accounting, room and ticket booking and email distribution systems, as appropriate, and will be accessible only by the designated individuals who use the information to fulfil the purposes for which it is held. This may include external data processors, all of whom are within the UK and subject to the same data protection rules as we are.

Where you have agreed to receive a payment from us by electronic transfer, your bank name, sort code and account number will be stored on our bank's secure payment system, and accessible only by designated individuals at Malvern Cube.

We will not send you marketing or communication material (including Malvern Cube's newsletter) unless you have agreed to receive it. You may of course unsubscribe at any time.

You have the right to know what personal data we hold about you, which will be provided on receipt of a written request* to the Centre Manager. You have the right to remove it at any time, either by 'unsubscribing' from regular communications, or by a written request* to the Centre Manager. In this case we will then be unable to process future bookings or advise you of future events at the Cube until and unless you provide the appropriate personal data to allow us to do so.

We will not share your personal data with any other organisation, unless we have a written request* from you, or your prior written permission*. In either case we will notify you of the name of the organisation, the data provided to it, and the reason for providing it. However,

where Malvern Cube's ticketing system is used to sell tickets on behalf of a third party, we will pass on details of those purchasing tickets to the third party to enable them to undertake front of house ticket checks. Where the purchaser has opted in to receive information via this booking process this will be considered as a request to receive information only from Malvern Cube and that third party.

- An e-mail is considered an appropriate form of written request in this context. E-mails should be sent to manager@malverncube.com