

The Venture (Wrexham) Ltd.

Privacy Policy

25/05/2018

The Venture (Wrexham) Ltd. is committed to protecting your personal data. We will only send you information if it is imperative or we have your explicit consent. We will never share your information to marketing companies. We will always process data lawfully and be fair and transparent in how we do this.

This Privacy Policy tells you how, as a Data Controller, we collect and store your data, why we need it and what we do with it.

If you have any questions regarding our Privacy Policy, the information you receive or the information we process and store, please contact:

Julie Humphreys
Y Fenter C.P.I. | The Venture I.C.C.
Garner Road
Wreccsam
LL13 8SF.

Email: JHumphreys@the-venture.co.uk

Telephone: 01978 355 761

Who are we?

The Venture is an Integrated Children's Centre situated in the Wynnstay ward of Caia Park, Wreccsam. We are a registered charity (1153454) and a company limited by guarantee (8011966).

What information do we need?

Under the Data Protection Act 1998 and the General Data Protection Regulation 2018, The Venture is the 'data controller' in respect of the personal information that we hold about you. This means that The Venture is responsible for keeping your personal information secure at all times and where applicable, only use it in a way that you have agreed to or is necessary.

We will only collect basic personal data to build a personal profile which may include your name, address, phone number, email and organisation or areas of work. During registration we ask for personal and potentially sensitive information relating to the children and young people who access our services, which may include name, address, date of birth, gender, language, national identity, ethnicity, religious beliefs (if any), disability, professional support in receipt, medication. We monitor attendance at our adventure playground,

children's centre, including Early Years Centre, and access to our services; this information may be linked or associated to the aforementioned profiles.

Regularly we take photographs and record videos to promote our work and share them on social media and other websites (including but not limited to Facebook, Twitter, Instagram, Tumblr & YouTube) and our own website (www.theventurewrexham.com). During registration we ask for parents or guardians to grant permission for such media to be used.

Why is The Venture allowed to process your personal data?

Under the Data Protection Act 1998 and the General Data Protection Regulation 2018, The Venture is a 'data controller' because we collect and process personal information. We are allowed to do this as long as we have a valid, lawful reason for doing so.

The following indicates which legal bases we are relying on to process your personal data:

As a member of The Venture, we will process your data to:

Provide you information on membership events, benefits, resources and information about our AGM (Annual General Meeting). This data processing is necessary for the performance of membership contract between us. We will also inform you of renewal dates, fees (if applicable) and this data processing is for the purposes of legitimate interests to assist with membership retention and engagement with The Venture.

As a parent, child or young person registering to access The Venture, we will process your data to:

- Allow us to contact the relevant people in the event of an emergency.
- Allow us to consider any additional needs you may require, in terms of language, disability, medication, religious observation, allergy et. al.
- Allow us to check if permission has been granted for actions such as administering First Aid, administering medical treatment in the event of an emergency, applying plasters, applying sunscreen and other screening methods, face paints and the taking, displaying and distribution of photographs and videos online and in print.
- Allow us to identify the different sectors and organisations we may need to work with to assist you. We may process new information given to us by different sectors and organisations which would have been obtained under their own privacy agreement(s).
- Allow us to provide you, our staff and partners with arrangements for meetings, agendas, minutes, papers and other relevant information.

How do we get your personal information?

We collect personal information that you have specifically given to us via our registration forms, 'Membership Form' or other data gathering documents issued by The Venture. We will also record anecdotal information or factual accounts (such as incident reports, accident records, referrals et. al.), as reported by staff.

What do we do with your information?

Your information is processed at The Venture's office in Wreccsam and, when risk assessed and authorised by management, at staff' private homes and other places of work. We will only use your information in the way that you have agreed to. For example, if you have asked to receive information about events, we will only send you information about events.

We make sure that your information is handled and stored securely and we will periodically review our procedures. We will not use your information to carry out automated decision making relating to you.

We may transfer information to the following organisations for the purposes outlined:

1. Microsoft: We use cloud storage and software in order to carry out our work and this is provided by Microsoft. The data is processed in the UK.
2. Wix: We use an online webmastering service in order to host our website and this is provided by Wix. Data is stored by them and "authorized affiliates" in the United States of America, in Europe (including in Lithuania, Germany and Ukraine), in Israel, and in other jurisdictions as necessary for the proper delivery of their Services and/or as may be required by law.
3. Local Authority: Many children and young people utilise The Venture to help navigate and compliment mainstream education. We communicate with schools to help achieve the best outcomes for those children and young people who attend both local schools and The Venture. We also provide support, advice and sign-posting to local authority services for parents, guardians and adult members of the community. From time-to-time we may need to refer to agencies to safeguard the best interests of safeguarding a child, young person or vulnerable adult. Examples of such local authority departments include (not are not limited to): Adult Social Care, Children's Social Care, Corporate & Customer Services, Education, Environment & Planning, Finance, Housing & Economy and CCTV/Surveillance. The local authority is Wrexham County Borough Council and their current Terms can be found at www.wrexham.gov.uk. In some circumstances we may have to communication with neighbouring local authorities including (but not limited to): Flintshire, Denbighshire, Conwy, Gwynedd, Isle of Anglesey and Powys in Wales and Cheshire West and Chester, Cheshire East and Shropshire in England.

4. North Wales Police: For the purposes of child protection and crime prevention, we communicate with local policing teams and North Wales Police centrally. North Wales Police is registered with the Information Commissioner in accordance with the requirements of (S. 19) of the Data Protection Act 1998 (Registration Number Z4895270). For more information please view their 'Fair Processing Notice'.
5. Agored Cymru: If you have enrolled on one of our accredited training courses, we will need to register individuals for accreditation with Agored Cymru. This is done through a secure portal hosted by Agored Cymru and is necessary for the accreditation process. Further information available on their website www.agored.cymru.

What type of information do we send out?

The Venture offers a wide variety of services and information and, as long as we have your consent, we may inform you of:

- Membership
- Newsletters
- Conferences
- Events
- Invitations
- Networks
- Consultations
- Surveys
- Policies
- Legislation changes
- Research
- Briefings
- Tools and resources

How long do we keep your information?

If you have joined as a member, we will keep your information for an initial period of 3 years after which we will contact you to renew your membership. As detailed in your membership application and pack, your name, address and email address will be kept in our legacy database for the purpose of contacting you in the event of a crisis or to inform you of a fundamental change to our organisation – you can opt out of this and request your information to be removed by contacting the Data Controller, as outlined above.

If you have registered as a child, young person, volunteer, adult or professional, for the purposes of open-access to the children's centre (including, but not limited to, Early Years Centre, adventure playground and Venture Alternative Learning (VAL) project), we will keep your information for an initial and general period of 6 years however your information may be kept for longer should it be outlined as necessary by an invested third party, i.e. funders or external accreditator. If you are no longer accessing services at the centre and wish for

your information to be removed, you can contact the Data Controller who will do so if it is not required to be kept by law or invested third parties.

Website

When you use our website, the following information is automatically collected:

- Date and time of visit.
- IP address.
- The type of browser used.
- The pages visited.
- Which items were downloaded.

Your visit to our website will remain anonymous as none of the data collected is linked to any personal information. We will only store and process personal data if you voluntarily provide personal details via an online form or enquiry.

Cookie Policy

Cookies are small text files that are put onto your device when you visit a website. They usually collect and store the information that you provide. Our cookies policy is dictated by Wix and outlined as such (accessed on 03/09/2018):

"There are two types of cookies:

Session (Transient) cookies: These cookies are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user.

Persistent (Permanent or Stored) cookies: These cookies are stored on your hard drive until they expire (i.e. they are based on a set expiration date) or until you delete them. These cookies are used to collect identifying information about the user, such as Web surfing behavior or user preferences for a specific site.

Take a look at the table below to view which cookies Wix places on Wix sites:

Cookie name	Life span	Purpose
svSession	Persistent	Identifies unique visitors and tracks a visitor's sessions on a site
hs	Session	Security
XSRF-TOKEN	Persistent	Security

Cookie name	Life span	Purpose
smSession	Persistent (Two weeks)	Identifies logged in site members
TSxxxxxxx (where x is replaced with a random series of numbers and letters)	Persistent	Security
TSxxxxxxx_d (where x is replaced with a random series of numbers and letters)	Persistent	Security

“

Donations

If you make a financial donation to The Venture, we will only process your personal information in order to administer your donation. We will not contact you unless you have asked us to do so and we will never share or sell you personal or donation information.

What are your rights?

Under data protection law, you have a number of different rights relating to our use of your personal information. The law relating to when these rights apply, the exceptions to your rights and our obligations are complicated. As a result, we have only set out below a brief summary of your rights and our obligations. To view additional information about your rights, please visit the Wales office of the Information Commissioners Office at www.ico.org.uk/about-the-ico/who-we-are/wales-office.

Your right of access to your personal data

- You have the right to ask The Venture whether we are processing your information.
- You have the right to see the personal information we hold about you unless doing so would undermine safeguarding or judicial protocols. There is no charge for this and when requested we will provide you with a copy of your personal data as soon as possible but within 28 days.

Your right to having personal data rectified

- You have the right to ask The Venture to rectify your personal data if it is inaccurate or incomplete.

Your right to be forgotten

- You have the right to have your personal data erased as long as:

- We no longer need this data in relation to the purpose for which it was obtained.
- Doing so would not undermine safeguarding and judicial protocols. Or if the legal ground for processing your personal data was consent and you are withdrawing that consent. This would only be undertaken if doing so would not undermine safeguarding and judicial protocols.

Your right to data portability

- In some circumstances you may have the right to ask us to provide you with an electric copy of your personal information either for your own use or to share with a third party. Where this right applies, you can ask us to transmit your personal data directly to the third party.

Your right to object

- You have the right to object to us processing your personal data where:
 - The basis for our processing is that we have a legitimate interest to do so but you are adversely affected by us doing this
 Or
 - We are using your personal information for the purposes of direct marketing. Where this applies you have the right to ask us to stop processing your personal information. You can stop receiving information from The Venture at any time by contacting JHumphreys@the-venture.co.uk.

Your right to restrict processing

- You have the right to block processing of your personal information. If The Venture are required to restrict our processing of your information we will be able to store it but not use it. We can only retain enough information about you to ensure that the restriction is respected in the future.

Your right to withdraw consent

- Where our use of your personal data is based on your consent, you have the right to withdraw consent. You can withdraw your consent in the following ways:
 - Email: JHumphreys@the-venture.co.uk
 - Phone: 01978 355 761
 - Post: The Venture I.C.C., Garner Road, Wreccsam, LL13 8SF.

Once we have received notification that you wish to withdraw your consent we will no longer process your information for the purposes that you originally agreed to. Please note, depending on our legal basis for processing your information, we may still process your data for different purposes.

General points about your rights

- You can make a request to exercise any of the rights summarised above. You can do this by post or email. See contact details on page 1.
- We will respond to your request within 28 days.
- The Venture may have the right to refuse to comply with your request. If this is the case we will contact you within 28 days to explain our reasons.
- The Venture will not charge you for exercising your rights.

If you wish to raise a complaint about how we have handled your personal data our Complaints Policy is on our website (www.theventurewrexham.com). If you are not happy with our response or believe we are not processing your personal data within the law, you can complain to the Information Commissioner's Office (ICO) by contacting:

Address: Information Commissioner's Office – Wales
2nd Floor, Churchill House
Churchill Way
Caerdydd
CF10 2HH.

Telephone: 016 2554 5297

Email: wales@ico.org.uk

Notification of changes

If we make substantial changes to this policy, we will post these on our website and social media outlets.