

The Pirate Castle, Gilbey's Wharf, Oval Road, London NW1 7EA

Policy Name:	Data Privacy Policy		
Version/ date of issue:	Version 1 – issued May 2018	Reviewed by:	Kal Webb, Development Manager
Trustee review date:	May 2018	Next review due	May 2019

1. **About this Policy**

- 1.1 This policy explains when and why The Pirate Castle collects personal information about our service users, including how we use it, how we keep it secure and your rights in relation to it.
- 1.2 The Pirate Castle may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website (<https://www.thepiratecastle.org/policies-guidelines>) or our Club noticeboard regularly for any amendments.
- 1.4 Our aim is to always to comply with applicable UK/European Data Protection legislation, including the General Data Protection Regulation (the GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, The Pirate Castle will be the “controller” of all personal data we hold about you and is registered with the ICO as a data Controller.

2. **Who are we?**

- 2.1 We are The Pirate Castle, a registered charity (number 1138787) and a company limited by guarantee. We can be contacted at Oval Road, Camden, NW1 7EA or on 0207267 6605 or at info@thepiratecastle.org.

3. **What information we collect and why**

We collect the following data from our service users:

- Contact information: name, address, telephone numbers, email addresses
- Emergency contact details: next of kin and doctor's details in the event of emergencies
- Age of users for Outdoor Education and Canal Boating services
- Details of qualifications held and disclosures (for example kayaking or boating qualifications and DBS checks)
- Details of state financial benefits received (where concessionary rates are applied for)
- Details of health conditions, disability and/or additional support needs (known as 'special category data') where a such a condition may impact upon service delivery/activity and/or we need to make use of specialist equipment
- Equal opportunities monitoring data including age, ethnic origin and gender
- Bank account details for the purpose of any refunds due to service users
- Photographic images and filmed footage of participants engaging in The Pirate Castle's activities for training purposes and promotional use on The Pirate Castle's

website, printed marketing materials and (where appropriate) on the charity's social media channels, where parental/the individual's permission has been given

We process the data on the following grounds:

- Complying with our obligations under contracts, including to you and to our insurers
- Delivering our activities safely and in accordance with the best-practice guidelines of governing bodies
- Providing services to participants with health conditions, disabilities and/or additional support needs
- CCTV footage of external areas for the purpose of security, safety and crime prevention
- Being able to act swiftly and safely in an emergency
- Attracting and delivering services to diverse users
- Securing future funding to deliver the Charity's aims

4. How we protect your personal data

4.1 We will not transfer your personal data outside the European Economic Area

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse and/or unauthorised alteration or destruction in accordance with ICO Data Protection principles

4.3 Please note, however, that where you are transmitting information to us over the internet, then given the internet is not a secure medium, we cannot definitely guarantee the security of this information

4.4 Special category data is kept in a locked cabinet to which only members of the core Pirate Castle staff team have access. Personal and special category data is only shared with instructors, youth workers or narrowboat skippers responsible for the activity in which the relevant individual is working where information sharing is necessary for the management and safety of services being delivered

4.5 Equal opportunities data is processed and reported to our funders and stakeholders only on an anonymised basis. No individual can be identified from the reports

4.6 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent

5.2 If it becomes necessary to pass your data to an external third party to enable us to provide products and/or services to you, we will only ever disclose data that is strictly necessary for the activity and will ensure that there is a data sharing agreement in place to safeguard your data

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data with the exception of retaining your personal

data in an archived form in order to be able to comply with future legal obligations, including but not limited to compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

6.2 We securely destroy all personal information once we have used it and no longer need it.

7. **Your rights**

7.1 You have rights under UK and EU data protection law, including:

(a) to be able to access the personal data held about you by submitting a Subject Access Request

(b) to be provided with information about how your personal data is processed

(c) to have your personal data corrected if incorrect records are held

(d) to have your personal data erased in certain circumstances

(e) to object to or restrict how your personal data is processed

(f) to have your personal data transferred to yourself or to another business in certain circumstances

7.2 If you wish for us to erase your data as outlined in paragraph (3) above then please contact us at info@thepiratecastle.org

7.3 If you have any concerns about how we process your personal data please contact us at info@thepiratecastle.org

7.4 You also have the right to take any complaint about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/concerns/>

0303 123 1113

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Manager.