**Area Association Privacy Notice**

2nd Penparcau Scouts (the “Scout Group”) ("we", "our", "us") take your privacy very seriously.

This Privacy Notice sets out how we use and look after the personal information we collect from you. As the organisation who is responsible for, and controls the processing of your personal data, we are the data controller, and sometimes also the data processor, and will take reasonable care to keep your information secure and to prevent any unauthorised access or use of it.

We may update this Privacy Notice from time to time and will inform you to any changes in how we handle your personal data.

1. **Information we may collect from you**

Personal data means any information about an individual from which that individual can be identified.

We may collect, use, store and transfer some personal data of our participants and if applicable, their parents or guardians, and other members. The data we collect from participants may include:

* Name, date of birth and gender.
* Contact information, such as home address, email address and telephone numbers.
* We may hold some health data or other special category data of some of our participants or members for the purposes of their health, wellbeing and welfare and, safeguarding. Where we hold this data it will be with the explicit consent of the participant or, if applicable, the participant’s parent or guardian.

Where we need to collect personal data to fulfil our responsibilities and a participant fails to provide that data, we may not be able honour or administer their participation in scouting.

1. **How is your personal data collected?**

A participant may give us their personal data by filling in forms or by corresponding with us by post, phone, email, in person, via our website or otherwise. This will typically be provided by a participant completing a registration form. Other participants, such as leaders volunteers and executive committee members may also submit data us or to the Area Association.

1. **How we use personal data**

We will use personal information only for the purposes for which it has been provided.

The reason we need participants’ and members’ personal data is to be able to run the Scout Group properly, to administer memberships and provide membership services that you are signing up to when you register with us and to ensure the we are able to comply with all applicable obligations in accordance with the Rules and Regulations of our governing body, the Scout Association of Wales. The lawful basis for processing the personal data is that we have a contractual obligation to you as a participant or member to provide the services that you are registering for and/or we have a legitimate interest to ensure that the Group is administered properly and in accordance with the Rules and Regulations of the Scout Association of Wales.

We have set out below, in a table format, a description of all the ways we plan to use your personal data and the legal basis we rely on to do so. Where appropriate, we have also identified what our legitimate interests are.

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| **Purpose/ Processing Activity** | **Lawful Basis for processing under Article 6 of the GDPR** |
| to respond to your enquiry; | Legitimate interest - To run the organisation efficiently and as it sees fit. |
| to administer the Scout Group; | Performance of a contract/Legitimate interest – For the purpose of administering the Scout Group |
| to send information to you; | Performance of a contract/Legitimate interest – To run the organisation efficiently and as it sees fit |
| to fulfil any contract that we may enter into with you; | Performance of a contract  |
| to send marketing information to you in accordance with the provisions set out below; or | Consent – We will only send direct marketing if the individual is an existing member, participant or other user of the site and the individual has not previously objected to this marketing, or, has actively provided consent. |
| sending out Scout and Scout Association of Wales information and updates  | Performance of a contract/Legitimate interest - To run the organisation efficiently and as it sees fit. |
| sharing data with Leaders and Volunteers | Legitimate interest - To run the organisation efficiently and as it sees fit. |
| sharing data with Scout Association of Wales | Performance of a contract/Legitimate interest - For the purpose of administering the scout group. |
| sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority | Legitimate interest – To run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Scout Group, participants and its Members. |
| publishing photos of participants and any Scout related photography and/or videography | Legitimate interest – To run the organisation efficiently and as it sees fit. Where possible and if reasonable grounds are identified, photography/videography can be removed / taken down on the request of those captured. ***(If under the age of 16, consent from the child and parent/guardian will be required prior to photo/video being published)*** |
| Publishing Group contact details in our handbook and/or App and/or online. | Legitimate interest - For the purpose of administering the Scout Group.. |

**Direct Marketing:** We would like to send you marketing information, by post, e-mail, or SMS. In addition, selected third parties (including the Scout Association of Wales) would like to send you marketing information, by post, e-mail, or SMS. We will only do this if you have given your consent to your personal data being used in this way (either when you submit your details to us or at a later stage). You can update your marketing preferences by writing to the Data Protection Officer at the address below.

1. **Sharing your personal data**

The Scout Group will submit participant and/or member details to the relevant Area Association, which is governed by the Scout Association. Leaders, volunteers and executive committee members will also submit their details to the relevant Area Association. We pass information to the Scout Association for affiliation and other reporting purposes.

We may share your personal data with our suppliers and sub-contractors in order to ensure that the Scout Group is administered properly, that participants are correctly registered and for safeguarding and licensing purposes and to comply with all applicable Rules and Regulations of the Scout Association.

Third-party service providers will only process your personal data for specified purposes and in accordance with our instructions.

We may disclose your personal information to third parties if we are under a duty to comply with any legal obligation; or to protect the rights, property, or safety of our participants, members or affiliates, or others.

1. **International**

Some of our events may involve the processing of personal data outside the European Economic Area (**EEA**) such as our website and email providers or events outside of EEA. We review the data protection terms of these suppliers to ensure that your personal data will only be transferred out of the EEA, if sufficient appropriate safeguards are in place.

1. **Protection of your personal data**

We are committed to protecting your privacy and have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. However, the nature of the Internet is such that the data may in some circumstances flow over networks without full security measures and could be accessible to unauthorised persons.

1. **Data Retention**

We keep personal data on our participants leaders and executive committee members while they are involved in the Scout Group. We will delete this data 6 yearsafter an individual has ended their membership or affiliation, or sooner if specifically requested and we are able to do so. We may need to retain some personal data for longer for legal or regulatory purposes.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

1. **Cookies**

When you visit our website, the website, we, may collect, process and use information about you which may not personally identify you but which may be helpful for improving the operation of the website. Such information may be collected through "traffic data" and may entail the use of "cookies", "IP Addresses" or other numeric codes used to identify your computer. You can delete cookies or configure your computer to reject them, although this may disable the website’s ability to manage individual sessions.

1. **Third Party Links**

This website may contain links to other sites. Please be aware that we are not responsible for the privacy practices of these sites. We encourage our users to be aware when they leave this website and to read the privacy statements applicable on those sites. This privacy policy does not apply to information collected on third parties’ sites.

1. **Your Rights**

All data subjects have the right to:

* **Request access** to your personal data
* **Request rectification** of the personal data that we hold about you.
* **Request erasure** of your personal data where there is no good reason for us continuing to process it.
* **Object to processing** of your personal data for direct marketing, or where we are processing on the grounds of a legitimate interest of that interest is overridden by your rights and freedoms.
* **Request restriction of processing** of your personal data while we establish the data's accuracy, or verify an overriding interest to object to processing; where our use of the data has been unlawful but you do not want us to erase it; where you need us to hold the data to establish, exercise or defend legal claims.
* **Request the transfer** of your personal data to you or to a third party in a structured, commonly used, machine-readable format.
* **Withdraw consent at any time** where we are relying on consent to process your personal data.
* **Complain** at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).
1. **Contact Us**

If you have any queries about this Privacy Policy, wish to stop direct marketing by the us, the Scout Association, its subsidiaries or third parties or you wish to access or update your information please email **secretary@penparcauscouts.org.uk** or write to: The Group Secretary p/a: Navy Hall, Bronant, SY23 4TF, Aberystwyth, Ceredigion.