

Hants and Dorset Christian Youth Camps – Privacy Notice for Campers

1. What is the purpose of this document?

Hants and Dorset Christian Youth Camps (“H&DCYC” or “we”) is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the General Data Protection Regulation (GDPR).

It applies to all campers on the Explorer, Discovery and Inheritance camps.

H&DCYC is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to give you the information contained in this privacy notice.

This notice applies to people who have applied to come to camp as well as current and former campers. This notice does not form part of any contract between us and you. We may update this notice at any time.

It is important that you read this notice, together with any other similar notice we may give you, so that you are aware of how and why we are using information about you.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- Name and title
- Date of birth
- Gender

- Next of kin and emergency contact information.
- Photographs (although we won't use your photograph unless we have your consent (or, if you're under 18, your parent/guardian's consent); we will ask you to renew your consent periodically).

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any allergies, medical conditions, disabilities, health and sickness records.
- Information about your religious beliefs (including, if applicable, church membership).

4. How is your personal information collected?

We collect personal information about you through the application form you (or your parent/guardian) fill out and send to us. We may collect further personal information about you at camp e.g. information on a medical form, or information required for safeguarding purposes – this would be collected from you directly, or from your parent/guardian.

5. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with you/your parent or guardian.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest.

6. Situations in which we will use your personal information

The main reasons we need the categories of information in the list above (see paragraph 3) are so that we can perform our contract with you/your parent or guardian, and so that we can comply with our legal obligations. In some cases we may use your personal information to pursue legitimate interests of our own or those of third parties. We will not do that if your interests and fundamental rights override those legitimate interests. The situations in which we will process your personal information are listed below.

- Administering the contract we have entered into with you/your parent/guardian (e.g. arranging tent groups and activities before camp starts and looking after you at camp (both on site and off site))
- Complying with our health and safety obligations.
- Complying with our legal and/or safeguarding obligations.

- As a not-for-profit organisation with religious aims in the course of our legitimate activities (running Christian holiday camps for children and young people).

In some situations, there will be more than one reason why we need to use your personal information.

7. If you fail to provide personal information

If you do not give us certain information when we ask for it, we may not be able to perform our contractual obligations in relation to you. For example, if you do not give us enough information about your medical conditions/allergies, it might mean that we cannot look after you properly while you are at camp. If that happens, we may not be able to accept your application for camp, or we may have to send you home from camp.

8. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

9. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our safeguarding policy.
3. Where it is needed on health grounds, subject to appropriate confidentiality safeguards.
4. In the course of our legitimate activities (with appropriate safeguards) as a not-for-profit body with religious aims.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public. We may also process such information about campers or former campers in the course of legitimate business activities with the appropriate safeguards.

Our obligations as a data processor

We will use information about your physical or mental health, or disability status, to look after your health and safety at camp. We will also use it to decide whether you are well enough to remain at camp and take part in planned activities, and to work out whether we need to make any adjustments for you.

Do we need your consent?

We do not need your consent to process special categories of your personal information if we need it to carry out our legal obligations or in the course of our legitimate activities as a not for profit organisation with religious aims. Sometimes, we might ask you for your written consent to allow us to process certain particularly sensitive data. If we do that, we will give you full details of the

information that we would like and the reason we need it. You can then decide whether you want to consent or not. You do not have to agree to any request for consent from us. If you do not want to give your consent, that will not stop you from coming on camp.

10. Automated decision-making

We are not planning to make any decisions about you using automated means. We will write to you if this changes.

11. Data sharing

We may have to share your data with third parties, including third-party service providers.

We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer our contractual relationship with you/your parent or guardian or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

We might share your information with third-party service providers. For example, that includes the people and organisations who run the activities you do on camp.

How secure is my information with third-party service providers?

We require all of our third-party service providers to take appropriate steps to protect your personal information. They are not allowed to use your personal data for their own purposes. They are only allowed to process your personal data for specific purposes, in accordance with our instructions.

What about other third parties?

In some circumstances, we may need to share your personal information with health professionals or safeguarding professionals, with a regulator or to otherwise comply with the law.

12. Data security

We have put steps in place to keep your information safe.

Third parties will only process your personal information on our instructions. We will only let them do that if they have agreed to treat the information confidentially and to keep it secure.

We have put appropriate security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, changed or shared. The only people who are allowed to see your personal information are people acting on behalf of camp, leaders and other third parties who have a need to know. They will only process your personal information on our instructions and they have to keep it confidential.

We will let you know if we think that there has been a data security breach (for example, if we have lost your information, or if somebody has changed it without permission). If we are legally required to do so, we will also tell any applicable regulator (e.g. the Information Commissioner's Office).

Data retention

How long will you use my information for?

We will only keep your personal information for as long as we need it to fulfil the purposes we collected it for. That includes satisfying any legal, accounting, or reporting requirements and making sure that we are able to defend any claims. To work out how long we should keep personal data, we think about:

- how much personal data we hold about you;
- what kind of personal data we hold about you;
- how sensitive that personal data is;
- whether there is any risk of harm from someone using or sharing your personal data when they are not allowed to;
- the purposes we need to process your personal data for;
- whether we really need your personal data to achieve those purposes, or whether there is a different way to do it; and
- the relevant legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you. If we do that, we are allowed to use that information without further notice to you. For example, we might keep information about how many campers come to camp each year, but without individual campers' names/details.

When you stop being a camper we will make sure that we look after your personal information in accordance with relevant laws and regulations. If we decide not to keep it, we will make sure that we securely destroy it.

13. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and up to date. Please let us know if your personal information changes so that we can update our records.

Your rights in connection with personal information

In some situations, by law you have the right to:

- **Ask for a copy of your personal information** (commonly known as a "data subject access request"). If you do this we will give you a copy of the personal information we hold about you. You will be able to check that we are processing it in the ways we are allowed to.
- **Ask us to correct any inaccurate personal information** that we hold about you. If you think that any information we hold about you is wrong, or incomplete, we will update it when you ask us to.
- **Ask us to delete your personal information.** If we do not have a good reason for continuing to process your personal information, we will delete/remove it when you ask us to. If you have asked us to stop processing your personal information, you can also ask us to delete it or remove it from our systems.

- **Tell us that you do not want us to process your personal information.** You can do this if we are processing your information because of a legitimate interest (or a third party's legitimate interests) and there is something about your particular situation which makes you want to object to processing on this ground. You can also tell us you do not want us to process your personal information if we are using it for direct marketing purposes.
- **Ask us to temporarily stop processing your personal information.** You might want to do this if you want to check that the information we hold about you is accurate, or if you want to ask us why we need to process it. We will not delete/remove it from our systems unless you ask us to (see above), but we will stop processing it.
- **Ask us to transfer your personal information** to someone else.

If you want to do any of the things listed above, please contact the Trustees in writing (trustees@hdcyc.org.uk).

No fee usually required

Normally, you will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, if your request for a copy of your information is clearly unfounded or excessive, we are allowed to charge a reasonable fee, or we can refuse to give you a copy.

What we may need from you

If you ask us to do any of the things listed above, we might need to ask you for more information to help us confirm your identity. This is so that we can check that you have the right to access the information (or to exercise any of your other rights). This helps us to make sure that personal information is not shared with anyone who does not have a right to receive it.

14. Right to withdraw consent

You can withdraw your consent at any time. That means that, if we are relying on your consent to us processing your data, you can ask us to stop, and to delete that data from our systems. For most types of data we will not be relying on your consent, so this is not likely to apply very often.

If you want to withdraw your consent at any time, please contact the Trustees, or the person who asked you for your consent originally. Once you have told us that you want us to stop processing your information, as long as we do not have any other legitimate basis for doing so, we will stop.

15. Changes to this privacy notice

We reserve the right to update this privacy notice at any time. We will provide you with a new privacy notice when we make any substantial updates. Sometimes we might give you additional information about how we process your personal information in other ways.

If you have any questions about this privacy notice, please contact the Trustees of H&DCYC (trustees@hdcyc.org.uk).