**Privacy notice for Positive Street Project (PSP).**

**This notice works alongside the overall EYST Privacy Policy which can be found at www.eyst.org.uk/....................., or by contacting info@eyst.org.uk**

**As the Positive Street Project uses your data in a distinct way, this notice outlines the ways in which we collect, store and process your personal data; our lawful basis for doing so, how long we will keep your personal data and your right to erasure/deletion under the General Data Protection Regulation (GDPR).**

You can contact us at any time to discuss how your personal data is used, or with any other concerns – Dr Abdul-Azim Ahmed, azim@eyst.org.uk 07969 681842, EYST Wales – Cardiff Offices, 1st Flr Offices, St Pauls Community Methodist Church, Loudoun Square, Butetown, Cardiff, CF10 5JA

**How we use your personal data**

We are committed to protecting your personal data.

The only data we collect from you is submitted via:

* **Signing In Forms**
* **Referral Forms**
* **Evaluation Forms**
* **Client Questionnaire**

We will use your personal data to (i) register you within the project, (ii) maintain a project participant database, (iii) manage the referral process, (iv) provide anonymised statistics to our funder – the Home Office, (iv) measure project impact/outcomes, (vi) monitor user experience and quality of delivery.

Our legal grounds for processing your data are in relation to points: (i) to (vi) above is **legitimate interest.**

We will not share your details with third parties for marketing purposes. In certain circumstances you can ask us to delete your data. See the section entitled ‘your rights’ below for more information.

We may anonymise your personal data (so that you can no longer be identified from such data) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**Data retention**

We will only keep your personal data for as long as is necessary to fulfil the purposes for which we collected it. The Positive Street Project is funded by the Home Office, which requires us to keep records for a period of 7 years from the end of the project.

**Your rights**

You have the right to ask us to delete the personal data we hold about you in certain circumstances. You are able to exercise certain rights in relation to your personal data that we process. You can find full information here:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

**Disclosure of your personal data**

We may have to share your personal data with (i) service providers who provide IT and system administration support, (ii) Home Office, audit and monitoring purposes (iii) the Positive Street Project’s lead organisation, EYST and (iv) EYST Director as part of my workload management.

We require any third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. They are only allowed to process your personal data on our instructions.

In relation to a Subject Access Right request, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to make a Subject Access Request, please send the request to EYST Wales, Units B & C, 11 St Helens Road, Swansea, SA1 4AB marked for the attention of Rocio Cifuentes, or email: director@eyst.org.uk

**Keeping your data up to date**

We have a duty to keep your personal data up to date and accurate so from time to time we will contact you to ask you to confirm that the personal data is we hold is still correct.

If there are any changes to your personal data (such as a change of address) please let us know as soon as possible by writing to or emailing us at: azim@eyst.org.uk

**Data security**

Protecting your data is important to us and we have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

**Complaints**

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues ([*www.ico.org.uk*](http://www.ico.org.uk/)).

We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

We may change this Privacy Notice from time to time and will notify you of any changes.