

**Privacy and Cookies Policy**

**EYST Wales**

1. **INTRODUCTION**

This privacy notice provides you with details of how we collect and process your personal data. **Ethnic Minorities and Youth Support Team Wales (EYST)** are the data controller and we are responsible for your personal data (referred to as “we”, “us” or “our” in this privacy notice).

Our email address is dataprotection@eyst.org.uk

Our postal address is **EYST Wales, Units B & C, 11 St Helens Road, Swansea, SA1 4AB**

If 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*](https://www.ico.org.uk/)). We would be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you.

It is very important that the information we hold about you is accurate and up to date. Please let us know if at any time your personal information changes by emailing us at dataprotection@eyst.org.uk or calling us on 01792 466980/1

In addition to this overarching privacy and cookie policy where an EYST Project or Service has a different lawful basis for processing your data, different retention periods or gathers sensitive personal data, this is covered by a specific Project Privacy Notice, as follows:

**Resilience Project**

**The Belonging Project**

**Family Link Project**

**BME Sport Cymru (Swansea)**

**Syrian Resettlement Programme**

**Positive Street Project (Cardiff)**

**All Wales BAME Engagement Programme**

**Refugees Contribute**

**EYST Summer Play Scheme**

**Progression Project**

**Young Migrant and Welsh**

**Refugee and Asylum Advice Project**

**City Health Asylum Support Service**

**BME Carers Project**

**Local Communities Youth Sport Trust Project**

**Homework Clubs (Cardiff & Swansea)**

**BME Skills Project**

**Sensitive Data**

For the majority of engagement activities, we do not need to collect sensitive data from you, however; If you are applying to become a volunteer with one of our projects, using the services of EYST Wales, or applying for a paid position at the organisation, we need to collect the following sensitive data about you in order to provide the service and fulfil funder monitoring requirements.**This data will only be passed on as anonymous statistical information, which will not be connected to your identity:**

* **Race or ethnicity**
* **Sexual orientation**
* **Information about your health**
* **Criminal convictions or offences**

We require your explicit consent for processing sensitive data and we will request your signature for this consent. Where sensitive data is required by an EYST Wales project, this will be covered by a separate Privacy statement.

1. **HOW WE USE YOUR PERSONAL DATA**

We will only use your personal data when legally permitted. The most common uses of your personal data are:

1. Where we need to perform the contract between us.
2. 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.
3. Where we need to comply with a legal or regulatory obligation.
4. We never have and never will sell your personal data.

Generally, we do not rely on consent as a legal ground for processing your personal data, other than in relation to sending information communications to you via email or hardcopy. You have the right to withdraw consent to information communications at any time by emailing us at dataprotection@eyst.org.uk

**Purposes for processing your personal data**

Set out below is a description of the ways we intend to use your personal data and the legal grounds on which we will process such data. We have also explained what our legitimate interests are where relevant.

We may process your personal data for more than one lawful ground, depending on the specific purpose for which we are using your data. Please email us at dataprotection@eyst.org.uk if you need details about the specific legal ground we are relying on to process your personal data.

EYST Wales run a number of projects / services where the specific personal data collected may include details such as your name, date of birth, email address, postal address, telephone number and email address, as well as information you provide in any communications between us. You will have given us this information whilst registering for an event or activity, requesting a service, or signing up as a volunteer.

We will mainly use this information:

* To provide the services or activities that you have requested.
* To update you with important administrative messages about the event, activity or services you have requested.
* To keep a record of your relationship with us.
* Where you volunteer with us, to administer the volunteering arrangement.

If you do not provide this information, we will not be able to sign you up for a particular event or activity or provide the services you have requested. The lawful basis for us processing this information is therefore the performance of a contract with you.

We may also use your personal information:

* To contact you about our work and how you can support EYST Wales.
* To invite you to participate in surveys or research.

Please contact the project you are involved with to request a copy of their Privacy Policy if it is not available on their project page on the EYST Wales website or listed at the beginning of this policy. It is necessary for our legitimate interests to fulfil our role as an organisation supporting ethnic minority young people, families and individuals in Wales.

**Project/Thematic specific communications**

You will receive Project/ Thematic specific communications from us if you have:

1. requested information from us or purchased services from us (for example, training); or
2. if you provided us with your details and positively opted in at the point of entry of your details for us to send you sector specific communications; and
3. in each case, you have not opted out of receiving that sector specific communication.

Where the communications were requested on an ‘opt in’, consent basis, you can ask us to stop sending you messages at any time by emailing us at dataprotection@eyst.org.uk.

Where you opt out of receiving our sector specific communications, this will not apply to personal data provided to us as a result of a service purchase, support request, monitoring report or other transactions.

3.  **DISCLOSURES OF YOUR PERSONAL DATA**

We may have to share your personal data with the parties set out below for the purposes set out above:

1. Service providers who provide IT and system administration services (Including Greenlight IT).
2. Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services (Including Gordon Down Accountants).
3. HM Revenue & Customs, the Charity Commission, and other regulators and authorities based in the United Kingdom and other relevant jurisdictions who require reporting of processing activities in certain circumstances.
4. Funders who may require data for monitoring purposes (this is usually provided on an anonymised statistical basis. If we are required to disclose personal, identifiable data, we will ask for your permission). This includes Swansea Council, Cardiff Council, Powys Council, Carmarthenshire Council, WCVA (Wales Council for Voluntary Action), Sports Wales, BBC Children in Need, Lloyds Bank Foundation, Big Lottery Fund Wales, Welsh Government, NHS Wales, Home Office, Esmee Fairbairn Foundation and other project / service specific funders.

We require all 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. We only allow such third parties to process your personal data for specified purposes and in accordance with our instructions.

**4.**  **INTERNATIONAL TRANSFERS**

We do not transfer your personal data outside the European Economic Area (**EEA**).

**5.**  **DATA SECURITY**

We 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. In addition, we 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, and a memorandum of understanding governing the data use.

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

6. **COOKIE USAGE**

**About cookies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

**Cookies that we use**

We use cookies for the following purposes:

(a)    authentication - we use cookies to identify you when you visit our website and as you navigate our website

(b)    status - we use cookies to help us to determine if you are logged into our website

(c)    personalisation - we use cookies to store information about your preferences and to personalise the website for you

(d)    security - we use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally

(e)    analysis - we use cookies to help us to analyse the use and performance of our website and services

(f)    cookie consent - we use cookies to store your preferences in relation to the use of cookies more generally

**Cookies used by our service providers**

Our service providers use cookies and those cookies may be stored on your computer when you visit our website.

We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy>

**Managing cookies**

Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:

(a)    <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);

(b)    <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>(Firefox);

(c)    [http://www.opera.com/help/tutorials/security/cookies/](https://www.opera.com/help/tutorials/security/cookies/) (Opera);

(d)    <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

(e)    <https://support.apple.com/kb/PH21411> (Safari); and

(f)    <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

Blocking all cookies will have a negative impact upon the usability of many websites. If you block cookies, you will not be able to use all the features on our website.

7. **DATA RETENTION**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal / contractual requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

Funders have varying requirements for the retention of grant-specific data, however the longest this will be is 7 years after the end of the grant period.

In some circumstances you can ask us to delete your data: see below for further information.

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.

8. **YOUR LEGAL RIGHTS**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These include the right to:

* Request access to your personal data.
* Request correction of your personal data.
* Request erasure of your personal data.
* Object to processing of your personal data.
* Request restriction of processing your personal data.
* Request transfer of your personal data.
* Right to withdraw consent.

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

If you wish to exercise any of the rights set out above, please email us at dataprotection@eyst.org.uk.

You can see more about these rights at: <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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