



# KENELM *Youth Trust*

## PRIVACY STATEMENT

The Kenelm Youth Trust (The umbrella trust for Alton castle, Soli, BCYS and Kenelm Chaplaincy) serves young people across the Midlands. (UK Charity Registration No. 1144209) The Kenelm Youth Trust is committed to safeguarding your personal information. Our Privacy Policy explains how we hold and use personal information and your rights and options in relation to it, so please take a moment to read it carefully.

Please note that we have an additional privacy notice that applies if you apply for and/ or receive a bursary from us.

### 1) CHANGES TO THIS PRIVACY NOTICE

This Privacy Notice may change from time to time so it's a good idea to come back and read through it again regularly. Where necessary, for example if there are significant changes, we may also notify you of the changes to this Privacy Policy by email where possible.

This Privacy Policy was last updated in May 2018.

### 2) THIRD PARTY WEBSITES

Our websites contain hyperlinks to websites controlled by third parties. This Privacy Policy does not cover those websites and we are not responsible for their privacy practices or content - they will have their own privacy policies and we urge you to review them if you choose to follow those hyperlinks.

### 3) HOW IS MY PERSONAL INFORMATION COLLECTED?

We collect personal information in the following ways:

- Directly from you - For example, booking one of our Centres, by filling in forms on our websites (such as to sign up to our newsletter or register an interest in an event, or making a donation) or offline (including taking part in our events), or communicating with us by phone, email or letter or completing a survey or when you meet with us.



- Indirectly, for example through relevant third parties such as formal bodies such as The Diocesan Education Service or via schools to contact staff for relevant activities or to seek permission for occasional photographs or case studies.
- We may also receive information from analytics providers (such as Google or PayPal), contact, financial and transaction information from technical, payment and delivery services.
- We do not seek to access analytical information about you from social media such as Facebook and Twitter.

If we have not done so already, we will notify you when we receive personal information about you from other sources and tell you how and why we intend to use that personal information.

When you visit our websites - When you visit our websites, we automatically collect some technical information from your computer and information about your visit to the website and your use of it.

#### 4) WHAT PERSONAL INFORMATION WILL KENELM YOUTH TRUST COLLECT ABOUT ME?

We collect, store and use the following kinds of personal information:

- Identity data such as your name, social media interaction with us, feedback and survey responses)
- Photographs, video and/ or audio recordings.
- Contact data such as your address, email and telephone numbers.
- Financial data such as bank account and payment details, and Gift Aid information.
- Transaction data, including details of payments and donations.
- Communication preferences from forms used at events and visits.

#### 5) HOW AND WHY WILL KENELM YOUTH TRUST USE MY PERSONAL INFORMATION?

The Kenelm Youth Trust will use your personal information for purposes specified in this Policy. In particular, including:

- for "service administration purposes", which means that Kenelm Youth Trust may contact you for reasons related to the service you have signed up for.
- to provide you with information or support;
- to administer bursaries
- to contact you about a submission you have made to the websites, including any content you provide.
- to enable us to review, develop and improve the opportunities, services and special offers online.
- to occasionally carry out surveys or market research.

- to send you details of Kenelm Youth Trust's work, youth activities, retreats, promotions, products, services, special offers and free resources that we think will be of interest to you. It's up to you to decide whether or not you want to receive this information.
- to process donations.
- to communicate with you in general and to manage relationships with our supporters and users.
- to audit and administer our accounts.
- to satisfy legal and regulatory obligations, and for the prevention of fraud or misuse of services.
- for the establishment, defence and/ or enforcement of legal claims.

Where Kenelm Youth Trust proposes using your personal information for any other uses we will ensure that we notify you first. You will also be given the opportunity to withhold or withdraw your consent for your use other than as listed above.

## 7) WHEN AND HOW WILL KENELM YOUTH TRUST CONTACT ME?

Kenelm Youth Trust may contact you for a number of different purposes using the contact details you have provided. The basis on which we do so differs depending on the purpose of the communication, and specifically whether it is a publicity communication or not e.g. Local youth event.

Marketing/Publicity communications:

We may use your contact details to provide you with information about our Youth Ministry work and campaigns which we consider may be of interest to you. Where we do so by email we will obtain your consent to do so (which can be withdrawn) – for example, if you sign up to receive newsletters from our website or event. Where we do so by post, we are doing so on the basis of our legitimate interests, unless you opt-out.

Generally, we send the following types of marketing and publicity communications:

- Updates about our Youth Ministry work or the work of partner organisations and projects that we support.
- Campaigns and fundraising appeals.
- Information about events. Note that if you sign up to an event we will then send you administrative communications about the event. On occasion we may also send you a reminder about the same event in future years in case you want to participate in it again.
- Surveys about our services (participation is always voluntary). For example to gauge training needs we can offer at our training and retreat days.

You control how we use your personal information for these purposes, and can update your preferences at any time – please contact us at [events@kenelmyouthtrust.org.uk](mailto:events@kenelmyouthtrust.org.uk) if you would like to do so. If you opt out of these communications we may retain some appropriate information to enable us to comply with the request not to be contacted in the future.

## Administrative and other communications

We will communicate with you using the contact details you have provided for essential administrative and other non-marketing purposes, such as to respond to queries, administer a donation or provide you with services or information you have requested, or contact you about an event you are attending, or for research purposes. For example youth group leaders will communicate through their usual channels to share practical information on activities.

Note that we may still need to communicate with you for these purposes even where you have opted-out of receiving marketing communications from us.

## 8) WILL KENELM YOUTH TRUST SHARE MY PERSONAL INFORMATION WITH ANYONE ELSE?

Generally, we will only use your personal information within the Kenelm Youth Trust and share with third parties to the extent required to achieve the purposes set out in this Privacy Policy. We require these third parties to respect and safeguard your personal information and only in accordance with our instructions.

Those third parties may include:

- pilgrimage operators or travel companies we are travelling with, on travel you are undertaking with Kenelm
- event organisers e.g. Flame
- insurers and professional service providers such as accountants and lawyers
- financial companies that collect or process donations on our behalf, and external fundraising platforms
- regulatory authorities, such as HMRC.

We also reserve the right to disclose your information to third parties for their own purposes in some cases. For example:

- If we are under a legal or regulatory duty to do so.
- To protect the rights, property and/ or safety of the charity, its personnel, supporters, users or others (including you).

## 9) PROTECTING YOUR PERSONAL INFORMATION

We take appropriate and proportionate measures to keep your personal information secure and to prevent the loss, destruction or misuse of it. For example, information is stored on a secure server and can only be accessed by authorised personnel.

Please note that the transmission of information via the internet is never completely secure, and although we do our best to protect it, we cannot guarantee the security of personal information transmitted over the internet.

Generally, the personal information we collect is stored at a destination within the UK or European Union. We use agencies and/or suppliers to process personal information on our behalf and so personal information may therefore be transferred, stored, or accessed outside the UK or EU. In these cases we take all steps reasonably necessary to ensure that appropriate safeguards are in place (for example, by entering into an agreement approved by the European Commission for this purpose).

## 10) CHILDREN AGED 16 OR UNDER

As an educational retreat Centre and Youth Ministry provider we do collect some necessary information on under 16s. Due to the nature of our work many beneficiaries of our partner organisations are children and young people staying at our projects from schools, parishes and youth organisations. Where that information is collected and shared with us, we will always have in place appropriate safeguards and any necessary consent. Where possible and appropriate (for example where using personal information for case studies), we or our partners will also seek consent from a parent or guardian for those under 16.

Users of our services at open events, such as our Camp, are asked to confirm they are over 18 and we require parental or guardian consent for those under 16 who stay residentially – we may carry out checks to ensure this has happened.

## 11) HOW LONG WILL KENELM YOUTH TRUST KEEP MY PERSONAL INFORMATION?

We will hold your personal information only for as long as is necessary for the purpose(s) for which it is being held, and to satisfy any legal, accounting or reporting requirements. This length of time may vary depending on those purposes, and if you would like further information please contact us (see details below).

In general terms, we will keep contact information for five years following the last contact or engagement for marketing/ fundraising contact.

## 12) OUR LEGAL BASIS FOR COLLECTING AND USING YOUR PERSONAL INFORMATION

The law requires us to have one or more of the 6 lawful grounds to collect and use your personal information. The following are relevant to the purposes set out above:

- Where you have given your consent (for example, to receive marketing emails and text messages). This consent can be withdrawn.
- Where there is a contract and the use is necessary for the performance of the contract or to take steps at your request prior to entering into it such as booking one of our centres (though the majority of our relationships are voluntary).

- Where there is a legal obligation. For example, to share your personal information with HMRC to process Gift Aid.
- Where it is in your/somebody else's vital interests (for example in the case of a medical emergency suffered at an event).
- Where Kenelm Youth Trust or others have a "legitimate interest" in the collection and use. The law allows personal information to be collected and used if it is necessary for a legitimate interest – ours are set out here in general terms.
- 

Sometimes it is not practical to ask for consent and we will rely on this legal basis. Where these situations relate to marketing and fundraising, note that you can change your preferences by contacting us (see details below).

We consider and balance any potential impact on you (both positive and negative) and your rights when relying on this ground.

What are Kenelm Youth Trusts legitimate interests?

Where we rely on legitimate interests, depending on the activity those might be Kenelm Youth Trusts interests or those of a partner organisation such as a parish youth group or school.

These legitimate interests, ultimately, are in the running of a commercial entity in pursuit of our charitable objectives, and include the following:

- Charity governance, including delivery of our purposes, statutory and financial reporting and other regulatory compliance.
- Administration and operational management, including responding to solicited enquires, providing information, research, donor due diligence, events management, the administration of our projects and employment and recruitment requirements.
- Fundraising, marketing and campaigning, including administering campaigns and donations, and sending direct marketing by post (and in some cases making marketing calls).
- Providing our services, and this can include your interests, such as when you have requested information or services from us, or the interests of beneficiaries.

### 13) CAN I FIND OUT WHAT PERSONAL INFORMATION KENELM YOUTH TRUST HOLDS ABOUT ME?

You can contact us asking what personal information Kenelm Youth Trust holds about you and to request a copy. Once we are satisfied with your identity and that the right applies we will have 30 days to comply.

## 14) YOUR PRIVACY RIGHTS

In addition to the right of access, you have a number of rights in relation to our use of your personal information. These include the right:

- to withdraw consent – where we are relying on your consent to use your personal information, you can withdraw that consent at any time.
- to object to processing (use) – you have the right to object where we are (i) relying on the legal basis of our legitimate interests (ii) using your personal information to send direct marketing or (iii) using it for statistical purposes.
- to erasure – in some cases, you can ask us to delete your personal information from our records (or anonymise it). We may retain some (limited) information in order to ensure you are not contacted by us in the future.
- to restrict processing – instead of deletion, you may ask us to restrict our use of your personal information.

To exercise any of these rights, please contact us (details below) with an explanation of the rights you wish to exercise. Note that we may ask for proof of ID or further information.

These rights only apply in limited circumstances. If you would like more information, you can contact us (details below) or consult guidance from the Information Commissioner (the UK regulator) here - <https://ico.org.uk/fororganisations/guide-to-the-general-data-protection-regulation-GDPR/individual-rights/>

## CONTACT US (INCLUDING COMPLAINTS)

If you have any questions or concerns about this Privacy Policy or our use of your personal information, please let us know by contacting us in one of the following ways:

By post: Data Officer, Kenelm Youth Trust Co Alton Castle, Castle Hill Road, Alton, Staffs, ST104TT

By email: [data@kenelmyouthtrust.org.uk](mailto:data@kenelmyouthtrust.org.uk)

By phone: 01538703224

Or to a Trustee C/o Kenelm Trustees, Kenelm Youth Trust at the above address.

You are entitled to make a complaint at any time to the Information Commissioner's Office, the UK regulator for data privacy – [www.ico.org.uk/global/contact-us](http://www.ico.org.uk/global/contact-us). We are always grateful for the opportunity to resolve your concerns before you feel the need to speak to the ICO.