



Privacy Policy

Adventure Play Hub

Prepared & Owned by: Harriet Simmons, Playground Manager on 17.04.2020

Role: Data Protection Officer

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How we respect your privacy when we deal with personal information collected by the Adventure Play Hub:

This Privacy Policy applies to information Adventure Play Hub collect about individuals who interact with our organisation. It explains in plain language, what personal information we collect and how we use it.

If you have any comments or questions about this notice, feel free to contact us at hello@adventureplayhub.org or 020 7586 1884.

1. Personal data that we process

The following table explains the types of data we collect and the legal basis, under current data protection legislation, on which this data is processed.

| Purpose | Data (key elements) | Basis |
|--|---|--|
| Enquiring about our organisation and its work | Name, email, message | Legitimate interests - it is necessary for us to read and store your message so that we can respond in the way that you would expect. |
| Subscribing to our Newsletter email updates about our work | Name, email | Consent - you have given your active consent when registering with us. Details of how to opt-out are outlined in the Newsletter. |
| Making a booking and payment | Name, email, address, payment information | Legitimate interests - this information is necessary for us to fulfill your intention of paying your child's attendance fees and your expectation of receiving a booking confirmation message. |

| | | |
|---|---|--|
| <p>Signing up as a member (completing our online registration form)</p> | <p>Name, email, contact details, giving active consent to email updates and use of photographs of your child for marketing purposes, newsletter when registering with us.</p> | <p>Contract - by completing the registration process & paying your membership fees, you enter into a contractual relationship with us as set out in our membership terms and conditions.</p> |
| <p>Website functionality and Newsletter (Mailchimp)</p> | <p>Website activity collected through cookies</p> | <p>Legitimate interests - it is necessary for us to store a small amount of information, usually through cookies, to deliver functionality that you would expect, such as remembering emergency contact information, allergies, health conditions or SEN to ensure suitable care for your child.</p> |

2. How we use your data

We will only use your data in a manner that is appropriate considering the basis on which that data was collected, as set out in the table at the top of this policy.

For example, we may use your personal information to:

- a. Reply to enquiries you send to us via email or phone.
- b. Handle payments, donations or other transactions that you initiate on-site (recorded in a physical receipt book)
- c. Where you have specifically agreed to this during the registration process, send you newsletters, marketing communications and relevant updates surrounding the Adventure Play Hub by email, relating to our work which we think may be of interest to you.

3. When we share your data

We will only pass your data to third parties in the following circumstances:

- a. You have provided your explicit consent for us to pass data to a named third party.
- b. We are using a third party purely for the purposes of processing data on our behalf and we have in place a data processing agreement with that third party that fulfils our legal obligations in relation to the use of third party data processors.

- c. We are required by law to share your data i.e. in life-saving circumstances, for example giving it to a doctor after a serious incident or accident.

In addition, we will only pass data to third parties outside of the EU where appropriate safeguards are in place as defined by Article 46 of the General Data Protection Regulation.

4. How long we keep your data

We take the principles of data minimisation and removal seriously and have internal policies in place to ensure that we only ever ask for the minimum amount of data for the associated purpose and delete that data promptly once it is no longer required.

Where data is collected on the basis of consent, we will seek renewal of consent annually, when you renew your membership with us. If you no longer have a membership with the Adventure Play Hub, any data you have previously consented to us will be deleted promptly.

5. Rights you have over your data

You have a range of rights over your data, which include the following:

- a. Where data processing is based on consent, you may revoke this consent at any time and we will make it as easy as possible for you to do this. You must either tell a member of staff on-site, explicitly state this in the form on an email or letter, or if you would just like to opt-out of receiving our newsletters, click the 'unsubscribe' link at the bottom of all our newsletters.
- b. You have the right to ask for rectification and/or deletion of your information, should you wish to end your membership with us.
- c. You have the right to access to your information at a suitable time, arranged between you and the Playground Manager.
- d. You have the right to lodge a complaint with the Information Commissioner if you feel your rights have been infringed.

A full summary of your legal rights over your data can be found on the Information Commissioner's website here: <https://ico.org.uk/>

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please get in touch with us.

Please note that relying on some of these rights, such as the right to deleting your data, will make it impossible for us to continue to deliver some services to you. However, where possible we will always try to allow the maximum access to your rights while continuing to deliver as many services to you as possible.

6. Cookies & usage tracking

A cookie is a small file of letters and numbers that is downloaded on to your computer when you visit a website. Cookies are used by many websites and can do a number of things, eg remembering your preferences, recording what you have put in your shopping basket, and counting the number of people looking at a website.

Where cookies are used to collect personal data, we list these purposes in section 1 above, along with other personal data that we collect. However, we also use some cookies that do not collect personal information but that do help us collect anonymous information about how people use our website. We use Google Analytics for this purpose. Google Analytics generates statistical and other information about website usage by means of cookies, which are stored on users' computers. The information collected by Google Analytics about usage of our website is not personally identifiable. The data is collected anonymously, stored by Google and used by us to create reports about website usage. Google's privacy policy is available at <http://www.google.com/privacypolicy.html>

7. Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website and update you via email. If a modification meaningfully reduces your rights, we'll notify people whose personal data we hold and is affected.

Approved by the board of trustees.