

## PRIVACY NOTICE

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## Introduction

Summer Hype is committed to your privacy as set out in our Data Protection Policy. This privacy notice describes the specific ways in which Summer Hype uses and protects your personal information.

Where reference is made to “the executives” this refers to Manya Eversley and Emma Mittelman. The responsible person for data protection is Maia Cohen-Lask, one of the trustees of Summer Hype. They can all be contacted on [info@summerhype.org](mailto:info@summerhype.org).

## Participants

### Why we collect personal data

We collect data in order to safely accommodate participants and leaders on our events, and to contact participants and their parent(s)/guardian(s) (for under 18s) with details needed for the event they are signed up for and in order to advertise future events. We also collect it in order to gather cohort-level data for the purposes of fundraising.

### The type of personal data we collect

We currently collect and process the following information for all participants at our events:

- Personal identifiers (name, DOB, gender)
- School details
- Contact details
  - Home address
  - Phone number
  - Email address
- Contact details of up to three guardians (as all participants are under 18)
- Health information including:
  - Doctor’s contact details
  - Vaccination history
  - Relevant medical history
  - Allergies
- Details of any special educational needs
- Any known welfare issues disclosed by the participant / their parents:
  - This includes if the participant is known to a social worker

- This includes any information the participant provides about any involvement with the criminal justice system
- Eligibility for free school meals / pupil premium
- If the participant is living in temporary accommodation or in care

In addition, for those participants who consent (see below) we collect photographs of participants on our events.

## **Lawful Purpose**

### ***Data Collected on application***

#### *Legitimate Interest*

In order to be able to operate its residential summer camps efficiently, effectively and safely for the participants, it is in the legitimate interests of the Charity to hold such personal information on its participants as will enable the Charity to:

- Ensuring that any particular needs of the participant are appropriately and sensitively accommodated when organising activities of the Charity, especially residential events;
- Enable the summer camp to be run with the welfare and safety of its participants as a priority;
- (In relation to contact details), communicate with the participants about the arrangements for summer camps and any other events.

#### *Special category personal data*

In addition, our status as a not-for-profit organisation permits us to lawfully process 'special personal data' (i.e. data relating to health), as long as it relates to individuals who have a connection to us (i.e. participants).

We do not disclose special personal data to other organisations without your consent. The data we do disclose to third parties (such as the venues for our events) is only done to the degree necessary to ensure the safety and welfare of our participants.

#### *Criminal offence data*

In addition, our status as a not-for-profit organisation permits us to lawfully process criminal offence data (i.e. information about criminal allegations or investigations against

the individual) as long as it relates to individuals who have a connection to us (i.e. participants).

We do not disclose special personal data to other organisations without your consent. The data we do disclose to third parties (such as the venues for our events) is only done to the degree necessary to ensure the safety and welfare of our participants.

### ***Photographs***

We seek explicit consent from participants (or, if they are under 13, their parents) to having their photos taken during our events. These photographs are taken for use in future marketing and promotional materials, including on our website and social media.

### **How data is collected and stored, and who has access to it**

#### ***Data Collected on Application***

Save for in a very limited number of circumstances (detailed below), the personal information on participants we process is provided to us directly by the participants / their parents. This is through the filling in of an online application form (a Google form) by which this data is provided. For participants aged under 13, or in cases where we judge that the participant is not capable of consenting, we require this data to be provided, and any consent to be given, by a parent or guardian.

If the executives identify specific welfare or safeguarding concerns in relation to a particular participant, then we may obtain additional data from third parties, such as the participant's school or social worker. If this information is thought necessary, consent will be sought from the participant (and, if appropriate their parent or guardian) before this data is obtained.

The data collected remains stored in the online application form, in a private drive on Google Drive, accessible only by the executives.

In addition, any welfare notes made prior to or during an event will be kept in order to refer back to, should you attend future events.

### ***Photographs***

Photographs of participants at our events are taken on a device belonging to Summer Hype, and not on any personal devices of the leaders. Before photographs are taken, the photographer will be informed of the names of any participants who has not consented to appear in photographs.

Immediately following the end of an event, these photographs are uploaded to in a private drive on Google Drive, accessible only by the executives.

## **Sharing the Data**

### ***Data Collected on Application***

When we share your data, we do so with your best interests as our primary consideration. We share data with the third parties described below solely for safeguarding and health reasons.

We share the following data with the site where the Charity's residential summer camp takes place:

- Personal identifiers (name, DOB, gender)
- Allergies
- Health information that is directly relevant to activities that may be carried out on the site (determined on a case by case basis by the Safeguarding leads of the Charity).

We review the site's GDPR policy prior to booking them as a venue.

We share the following data with some or all of the leaders on the summer camp:

- Personal identifiers (name, DOB, gender)
- Allergies
- Health and safeguarding information that is considered necessary to ensure the participant can be safely and sensitively accommodated. The data to be shared, and which leaders to share it with (i.e. just their dorm leader / the Welfare Lead on camp) is determined on a case by case basis by the Safeguarding leads of the Charity.

Leaders are trained in relation to GDPR, and specifically instructed not to further share this data.

Explicit consent will have been obtained prior to sharing special category personal data.

### ***Photographs***

We do not share photographs of you with any third parties. We use them only in our own promotional materials, including our website and social media.

## **Data Removal / Archiving**

We keep all participant data from the time of application until the September after they turn 18. This is retained to ensure that issues of health, safeguarding, and welfare, are accessible to the relevant leaders on all events that a participant attends.

If 12 months has passed without a participant attending one of Summer Hype's events, the data will be archived. The archive can only be accessed by the executives and only for the purpose of (a) deletion of the data the September after they turn 18 or (b) restoration of the data in the event that a participant returns to a future event.

## ***Photographs***

We retain photographs for 5 years before deletion.

## **Volunteers**

### **Why we collect personal data**

We collect data in order to safely accommodate participants and leaders on our events, and to contact participants and their parent(s)/guardian(s) (for under 18s) with details needed for the event they are signed up for and in order to advertise future events.

### **The data we collect**

For all volunteers, we collect and process the following information:

- Personal identifiers (name, DOB, gender)
- Contact details
  - Home address
  - Phone number
  - Email address
- Health information including:
  - Doctor's contact details
  - Vaccination history
  - Relevant medical history
  - Allergies

For our volunteers who are under 18, we collect the following data in addition:

- School details
- Contact details of up to three guardians
- Details of any special educational needs
- Any known welfare issues disclosed by the participant / their parents:
  - This includes if the participant is known to a social worker
  - This includes any information the participant provides about any involvement with the criminal justice system
- Eligibility for free school meals / pupil premium
- If the participant is living in temporary accommodation or in care

In addition, for those volunteers who consent (see below) we collect photographs of volunteers on our events.

## **Lawful purpose**

### *Legitimate Interest*

In order to be able to operate its residential events efficiently, and effectively, it is in the legitimate interests of the Charity to hold such personal information on its volunteers as will enable the Charity to:

- Communicate with its volunteers on matters relating to the operation of the charity, and the running of summer camps
- Seeking help, support and advice from volunteers, particularly where they have specific knowledge and experience;
- Ensuring that any particular needs of the volunteer are appropriately and sensitively accommodated when organising meetings and other activities of the Charity.

## **How data is collected and stored, and who has access to it**

### ***Data Collected on Application***

Save for in a very limited number of circumstances (detailed below), the personal information on volunteers we process is provided to us directly by the volunteers / their parents. This is through the filling in of an online application form (a Google form) by which this data is provided.

If the executives identify specific welfare or safeguarding concerns in relation to a particular junior leader, then we may obtain additional data from third parties, such as the participant's school or social worker. If this information is thought necessary, consent will be sought from the participant (and, if appropriate their parent or guardian) before this data is obtained.

The data collected remains stored in the online application form, in a private drive on Google Drive, accessible only by the executives.

In addition, any welfare notes made in relation to junior leaders prior to or during an event will be kept in order to refer back to, should you attend future events.

### ***Photographs***

Photographs of volunteers at our events are taken on a device belonging to Summer Hype, and not on any personal devices of the leaders. Before photographs are taken, the photographer will be informed of the names of any volunteer who has not consented to appear in photographs.

Immediately following the end of an event, these photographs are uploaded to in a private drive on Google Drive, accessible only by the executives.

### **Sharing the Data**

#### ***Data Collected on Application***

When we share your data, we do so with your best interests as our primary consideration. We share data with the third parties described below solely for safeguarding and health reasons.

We share the following data with the site where the Charity's residential summer camp takes place:

- Personal identifiers (name, DOB, gender)
- Allergies
- Health information that is directly relevant to activities that may be carried out on the site (determined on a case by case basis by the Safeguarding leads of the Charity).

We review the site's GDPR policy prior to booking them as a venue.



We share the following data with some or all of the leaders on the summer camp:

- Personal identifiers (name, DOB, gender)
- Allergies
- Health and safeguarding information that is considered necessary to ensure the junior leader can be safely and sensitively accommodated. The data to be shared, and which leaders to share it with (i.e. the Welfare Lead on camp) is determined on a case by case basis by the Safeguarding leads of the Charity.

Leaders are trained in relation to GDPR, and specifically instructed not to further share this data.

Explicit consent will have been obtained prior to sharing special category personal data.

### ***Photographs***

We do not share photographs of you with any third parties. We use them only in our own promotional materials, including our website and social media.

### **Data Removal / Archiving**

We delete all volunteer data if they have not participated in Summer Hype events for over 12 months.

### **Donors**

#### **Why we collect personal data**

We collect data in of donors order to:

- Process your donations and verify any financial transactions;
- Comply with the Charities (Protection and Social Investment) Act 2016 and follow the recommendations of the official regulator of charities, the Charity Commission;
- Keep a record of your relationship with us; and
- Contact you about our work and how you can support

## **The data we collect**

The majority of our donations are received via Big Give. The Big Give has its own privacy policy for the handling of data.

- If donors consent, their names and email addresses are provided to us;
- In any event, if required to process a Gift Aid claim, Big Give will provide us with names and addresses of relevant donors.

For donations made directly to us, the personal information we collect may include title, first name, last name, address, email address and card payment details.

We collect additional data relating to source of funds for large donations, as specified in our Donations Policy.

We retain solely the names and email addresses of donors who have consented to receive ongoing communications from us.

## **Lawful purpose**

### *Legitimate Interest*

We collect data of all donors in order to ensure we can:

- Comply with the recommendations of the Charity Commission, which require us to identify and verify the identity of supporters who make major gifts, so we can assess any risks associated with accepting their donations;
- Make any Gift Aid claims to HMRC that are not done directly by the donation platform;
- Identify any suspicious donations for the purpose of complying with the Proceeds of Crime Act 2002.

### *Consent*

All donors will be given the option to opt-in to direct marketing from Summer Hype. We will retain the contact details of these donors who consent.

## **How data is collected and stored, and who has access to it**

The names and contact details of donors who have consented are stored in our database on Google Drive, accessible only by the executives.

## Sharing the Data

We do not share donor data with any third parties, unless we have a legal requirement to share with (for example) HMRC.

## Data Removal / Archiving

Donor data is only stored with consent, and thus is removed at the request of the donor. All marketing emails contain the option to be removed from the database.

## Your rights

As an individual, whose personal data is processed by Summer Hype you have the following rights:

- [the right to access the data we hold about you](#)
- [the right to have your data rectified if its inaccurate](#)

If you are not happy with the way we have handled your data, and are unable to resolve the issue with us personally, you have the right to lodge a complaint with the Information Commission Office.

If you have any concerns about our use of your personal information, you can make a complaint to us at [info@summerhype.org](mailto:info@summerhype.org).

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

## Contact information

If you have any questions or concerns about this, please contact:

[info@summerhype.org](mailto:info@summerhype.org)

This policy was adopted by: Summer Hype (*name of provider*)

On: 30/11/2023

Date to be reviewed: 30/11/2024

Signed on behalf of the provider:

Name of signatory: Emma Mittelman

Role of signatory: Co-Chair of Summer Hype