



JOY (Joining Old and Young) - Privacy Policy

The privacy and security of your personal information is important to us at JOY and we are committed to ensuring that your personal data is protected. Any personal information collected by us will only be processed in accordance with this privacy policy.

A. What does this policy cover?

This privacy policy sets out how JOY processes personal data (that is, information by which an individual can be identified or which can be related to an identifiable individual) collected by us in the course of our lawful activities, and explains our obligations and your rights under the Data Protection Act 2018, the General Data Protection Regulation and any related or subsequent UK legislation or regulations ('Data Protection laws'). This policy has been put in place to protect your rights under the Data Protection laws, and it is important that you understand what we will do with your data and are happy with this.

If you wish to discuss any matter relating to how your data is used, please call us on 07811 771 069, email us at jenny@joiningoldandyoung.org.uk or write to us at 11 Green Lane, Edgware, Middlesex, HA8 7PL, marking your communication for the attention of the Data Protection Officer. We may be required in certain instances to ask that your request for information be submitted in writing.

References to the processing of information includes the collection, use, storage and protection of data.

JOY (Joining Old and Young) is a charity registered in England & Wales (no. 1182863) and is the 'data controller' within the meaning of the Data Protection laws for the purposes of this policy, except as stated otherwise. This policy extends to JOY's staff, trustees, volunteers and to the extent set out below, anyone else processing data on our behalf from time to time.

B. Why do we process your data?

Organisations are permitted to process personal data if they have a legal basis for doing so. JOY processes data on the basis that:

- Express and informed consent has been given by the person whose data is being processed or, in the case of a child who is too young to provide such consent, by their parent/guardian;
- JOY has a legitimate interest in processing the data; and/or
- It is necessary in relation to a contract, agreement or ongoing arrangement for the provision of services which someone has entered into with JOY or because someone has asked for something to be done so they can enter into a contract, agreement or arrangement with us; and/or



- JOY has a legal obligation to process data.

We may also process data that has been shared with us by another Data Controller, such as a school or elderly care facility from which participants are taking part in a JOY activity. In such cases, JOY may be a Data Processor within the meaning of the Data Protection laws, but will still process data in such a way as to protect its privacy and security and in accordance with the stipulations regarding its use made by the Data Controller. Where this is the case, JOY relies on the party sharing data with us that all requisite permissions, consents or other legal bases for sharing the data have been obtained or complied with.

If and to the extent that JOY is relying on solely consent as the basis for processing data, we are required to obtain your explicit consent and you can modify or withdraw this consent at any time by notifying us in writing, although this may affect the extent to which we are able to provide services to or interact with you in future.

We may change this policy from time to time and any such changes will be published online at www.joiningoldandyoung.org.uk. Notwithstanding any change to this policy, we will continue to process your personal data in accordance with your rights and our obligations in law.

This policy is effective from 3 May 2019.

B. What data do we collect?

We collect the data necessary for JOY to pursue its stated charitable objectives of advancing the education of young children and promoting social inclusion for elderly people including by, but not limited to, facilitating partnerships between and activities involving schools (including nurseries) and old people's homes and similar institutions, for running programs and events, keeping our supporters informed of our activities, marketing, fundraising and the effective running of JOY through its professional staff, trustees and volunteers. Data collected and processed may include, but not be limited to:

- Names and contact information such as telephone numbers, email and postal addresses
- Information relating to activity participants necessary for us to safely and successfully run events including, but not limited to, age, which organisation they attend or are connected with and relevant information concerning health, access or dietary requirements
- Photographic and video images which we may use for marketing and promotional purposes, including on social media, provided we have requisite permissions and/or consents



- Information relating to staff and volunteers necessary for their engagement and participation in JOY activities including, but not limited to, payroll details and information required to ensure the safeguarding of vulnerable persons
- Stakeholder, supporter and donor records (including payment information) and preferences
- Such other information that is relevant and necessary for JOY to carry out its activities, charitable purposes and legal obligations.

C. What we do with the data we process

JOY uses the data collected to maintain accurate internal records of our engagement with schools, teachers, volunteers, parents, event participants, supporters, partner organisations, staff and others. These records facilitate our activities run in accordance with our charitable objects as explained above. Data may be processed and viewed, to the extent necessary, by staff, trustees and certain volunteers in the course of JOY's activities (all of whom work in accordance with this privacy policy) and will be retained only for as long as is reasonable and permissible in law.

We may use your personal information to send you information about JOY and matters relating to JOY's activities which we think may be of interest to you. We will only share data with trusted third parties for the above stated purposes, including to process payments to or from individuals, to securely backup data, to run events (such as with venues for security purposes) or where necessary for us to communicate with you (such as mailing companies for postal communications or through email campaigns or newsletters). Data will only be shared in such circumstances once we are satisfied that doing so accords with our privacy policy and that shared data will be kept safely and securely and only for as long as necessary for the explicit purpose for which it was shared. We will not otherwise sell or share your personal information with any other charity, businesses or marketing companies without your explicit consent.

You, as the data subject, may unsubscribe from any mailing list you are subscribed to, including via our website, and you may request deletion or correction of your data at any time in writing, subject to any overriding legal requirement for its retention. We may keep certain limited data on a 'suppression list' so we know, if requested, not to contact you or process your data in future until further notice.

D. Your rights in relation to your personal data

You may request details of personal information which we hold about you. Any such request must be submitted in writing. A small fee may be payable if an information request is particularly onerous.

You may choose to restrict the collection or use of your personal information, but this may restrict the way in which JOY is able to interact with you. You



may, at any time, change your mind about what information we hold about you, or if we continue to hold it at all, subject to any legal obligation requiring JOY to retain data, such as the retention of donor or Gift Aid records for Her Majesty's Revenue and Customs or for reasons relating to the safeguarding and welfare of young or vulnerable people.

You are responsible for the accuracy of data you have provided to JOY. If you believe that any information we are holding about you is incorrect or incomplete, please write to us as soon as possible. We will promptly correct any information found to be incorrect.

You can obtain further information about Data Protection and privacy laws by visiting the Information Commissioner's website at: <https://ico.org.uk/for-the-public>.

E. Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the data we process. Persons processing data on behalf of JOY do so in accordance with this policy and on the basis that JOY is satisfied that they can and will adhere to our high standards for data protection and security.

The transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet. You are responsible, where applicable, for keeping any password or security information you use to login to our website or App confidential; we cannot see your password and will not ask you for your password.

F. Web browsing and Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.



We may also collect and store information about your browsing device, including, where available, your IP address, operating system and browser type, together with certain anonymous statistical data about your browsing activities and patterns which does not contain any personal data.

G. Links to other websites

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy policy. You should exercise caution and look at the privacy policy applicable to the website in question.