

DATA PRIVACY NOTICE

We take your privacy very seriously and we ask that you read this privacy notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal data, your rights in relation to your personal data and on how to contact us and supervisory authorities in the event you have a complaint.

Italicised words in this privacy notice have the meaning set out in the Glossary of Terms at the end of this document.

Who we are

Activity Club for Children with Special Needs (Berkshire) collects, uses and is responsible for certain personal data about you. When we do so we are required to comply with *data protection regulation* and we are responsible as a *data controller* of that personal data for the purposes of those laws.

When we mention Thumbs Up Club, "we", "us" or "our" we are referring to Activity Club for Children with Special Needs (Berkshire).

Activity Club for Children with Special Needs (Berkshire) is a charity registered with the Charities Commission (1104007) whose registered office is at Addington School, Woodlands Avenue, Reading RG5 3EU. We are also registered with Ofsted.

We provide you with a Holiday Club for children with additional needs at Easter and Summer Holidays, and an After School Club for children with additional needs during term time.

The personal data we collect and use

In the course of providing our service to you we may collect the following personal data when you provide it to us:

- *Personal Address and Contact Information for Parent/Carer and for child*
- *Ethnicity, school attended by the child, Local Borough*
- *Emergency Contact information for another individual*
- *Age and Medical/Health information about your child attending the Club*
- *Payment Card Information*

How we use your personal data

The below table sets out:

- how we use your personal data
- the lawful bases upon which we collect and use your personal data
- who we routinely share your personal data with

Rationale/Reason for	Lawful Basis for Processing	Third party recipients linked to that activity
<ul style="list-style-type: none"> • Personal address & Contact Information - we need to know where to be able to contact you 	To ensure that we have current full contact information should we need to contact you in respect of the services you are purchasing from us.	Data may be provided to Readibus if Transport is being provided.
<ul style="list-style-type: none"> • Ethnicity, School attended and Local Borough 	Organisations and Local Authorities who support us with funding require certain anonymous data in respect of	Complete Fundraising Ltd (anonymised), and Wokingham and Reading Councils.
<ul style="list-style-type: none"> • Emergency contact information for another individual 	If any problems arise during Club and we cannot get in contact with you we must have another point of contact should your child need to be	Club Management Team
<ul style="list-style-type: none"> • Age and Medical/Health information about your child attending the Club 	To ensure the safety and wellbeing of your child and other children attending the club	Club Management Team and Club Staff
<ul style="list-style-type: none"> • Payment Card Information 	To take payment for services provided and make refunds where appropriate.	We use a third-party payment site called Stripe for this purpose and all payment information is retained only on that site. The information is accessed by the Charity Treasurer and Committee

Special category data

Certain types of personal data are considered more sensitive and so are subject to additional levels of protection under data protection legislation. These are known as 'special categories of data' and include data concerning your health, racial or ethnic origin, genetic data and sexual orientation.

Please refer to the table above in respect of why and how we process this information.

Marketing

We do not send any marketing information out at all.

How long your personal data will be kept

The data you provide is stored through the booking site on a secure server. We have been advised that, because of the nature of the services we provide and to whom we provide those services, best practice is to keep that data until the club user has reached the age of 25.

This is broken down into:

Type of Data	Retention Period
Booking forms (electronic), including payment card details	Deleted securely each summer, so retained for a maximum of 13 months.
Care plans / Behaviour support plans (electronic and paper)	Working documents, updated and renewed as necessary; retained until the August after club user turns 25.
Accident / Incident / Physical Intervention / Alert / Pre-Existing Injury forms (paper) Medication Administration Forms (paper)	Paper copies will be scanned and stored electronically; retained until the August after club user turns 25.
Medical Care plans / Seizure Recording / Medication Consent / Medication signing in and out forms (paper)	Deleted securely each summer, so retained for a maximum of 13 months.
Daily Registers (paper)	Scanned and stored electronically. Retained for a period of 19 years post completion; to allow for the youngest attendees turning 25.
Changing logs / permission slips for ad hoc activities / notes from parents (paper)	Deleted securely each summer, so retained for a maximum of 13 months.

During the month of August each year, the stored data (electronic and paper) pertaining to any club user who has turned 25 during the past year will be disposed of securely.

Transfer of your information out of the EEA

We will not transfer your personal data outside of the European Economic Area or to any organisation (or subordinate bodies) governed by public international law or which is set up under any agreement between two or more countries.

Your rights

You have legal rights under *data protection regulation* in relation to your personal data. These are set out under the below headings:

- To access personal data
- To correct / erase personal data
- To restrict how we use personal data
- To object to how we use personal data
- To ask us to transfer personal data to another organisation
- To object to automated decisions
- To find out more about how we use personal data

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information or change your details where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are otherwise legally entitled to deal with the request in a different way.

To access personal data

You can ask us to confirm whether or not we have and are using your personal data. You can also ask to get a copy of your personal data from us and for information on how we process it.

To rectify / erase personal data

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but would need to verify the accuracy of the information first.

You can ask that we erase your personal data if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal data if you have either withdrawn your consent to us using your information (if we

originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, or where we have used it unlawfully or where we are subject to a legal obligation to erase your personal data.

We may not always be able to comply with your request, for example where we need to keep using your personal data in order to comply with our legal obligation or where we need to use your personal data to establish, exercise or defend legal claims.

To restrict our use of personal data

You can ask that we restrict our use of your personal data in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal data is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but we need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal data following a request for restriction where we have your consent to use it; or we need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To object to use of personal data

You can object to any use of your personal data which we have justified on the basis of our legitimate interest, if you believe your fundamental rights and freedoms to data protection outweigh our legitimate interest in using the information. If you raise an objection, we may continue to use the personal data if we can demonstrate that we have compelling legitimate interests to use the information.

To request a transfer of personal data

You can ask us to provide your personal data to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another *data controller* (e.g. another company).

You may only exercise this right where we use your personal data in order to perform a contract with you, or where we asked for your consent to use your personal data. This right does not apply to any personal data which we hold or process outside automated means.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy notice, you can ask us about what personal data we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we

protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal data.

If you would like to exercise any of the above rights, please:

- email or write to enquiries@thumbsupclub.co.uk or write to Thumbs Up Club, Addington School, Reading RG5 3EU
- let us have enough information to identify you, e.g. name, address, date of birth;
- let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
- let us know the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Our supervisory authority

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with the Information Commissioners Office. It has enforcement powers and can investigate compliance with *data protection regulation* (www.ico.org.uk).

We ask that you please attempt to resolve any issues with us before the ICO.

How to contact us

Please contact enquiries@thumbsupclub.co.uk you have any questions about this privacy notice or the information we hold about you.

This policy was adopted by: Thumbs Up Club

Date: 01/09/2022 Fiona Hulley

Date Reviewed	Reviewed by (Name/ Role)	Amendments made? (Or state remains up to date and relevant)
15/08/2023	Fiona Hulley – Operations Manager	Updates made to retention period for registers, changing logs, medical care plans, medication signing in and out and medical consent forms.
		<i>NB Not updated Summer 2024 due to no club running</i>
03/04/2025	Fiona Hulley - Trustee	Remains up to date and relevant.