



SMCA Privacy & Cookies Policy

The type of personal information we collect

The type of information we collect and process about you will depend on the level and nature of contact and interaction you have with us, including the services we provided to you. The range of information we may currently collect, and process includes:

- Personal identifiers, contacts, and characteristics (for example, name and contact details)
- Personal contact details such as name, gender, date of birth, email address
- Home address, Phone Number
- Ethnicity, sexual orientation
- Medical information or information about disabilities
- Names of dependents, names of contact details of next of kin
- Assessment information, relevant medical information, special educational needs information, exclusions / behavioural information
- Records of events attended

How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons.

We collect information about you when you visit our website or subscribe to our newsletters or publications. Information may also be sought from users who may have participated in centre activities. This maybe in the form of feedback surveys, which we can use to assist us improve our services.

The information is either needed to fulfil your request or to enable us to provide you with a more tailored service. You do not have to disclose any of this information. However, if you choose to withhold requested information, we may not be able to provide you with certain services.

We may also gather general information about the use of our website, such as which pages users visit most often, and which are of most interest. We may use this information to personalise the way our website is presented when users visit it, to make improvements to our website and to ensure we provide the best service for users. We will only use aggregated or anonymous information which does not identify individual visitors to our website. Please see the section below on Cookies.

Protected characteristics

We are bound by law not to discriminate against people for reasons such as age, ethnic origin, religion, and disability. We may ask you additional questions about yourself to monitor our services, and ensure they tackle discrimination and inequality. This is called 'protected characteristics' information.

You do not have to give us this type of information. We will request your consent.

Use of Cookies

Like most websites, we use cookies. Cookies are tiny pieces of data saved on your computer or mobile device. There are several types of cookies and they each have distinct functions or uses.

We may use cookies for a variety of reasons:

(a) Essential cookies – these are required for the operation of our website, for example to enable you to log in to secure areas of the website or make use of a shopping cart and e-payment services.

(b) Analytic/performance cookies – these allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

(c) Functionality cookies – these are used to recognise you when you return to our website so that we can personalise our content for you and remember your preferences, e.g., whether you are signed up to email alerts.

(d) Targeting cookies – these record your visit to our website, pages you have visited and links you have followed. We may use this information to make our website and the advertising displayed to you more relevant to your interests.

Marketing

Consent for use of your photographic, video, audio will be obtained separately. Any information you give us for marketing purposes e.g., in a blog post on our website, a quote on promotional material, etc will be anonymised unless you have given specific consent to be named.

How we protect your personal data

We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate, and up to date. We will ensure that your personal information is kept only for so long as is necessary for the purposes for which it was collected and is securely destroyed.

Your information will be protected from unauthorised or accidental disclosure and these principles apply whether we hold your information on paper or in electronic form. However, we cannot guarantee the security of Data in an account from unauthorised entry or use, hardware or software failure, and other factors.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting brenda@smca.org.uk

(b) We have a contractual obligation.

(c) We have a legal obligation.

(d) We have a vital interest.

(e) We need it to perform a public task.

(f) We have a legitimate interest.

We collect your personal information in several ways:

- When you provide it to us directly, e.g., when you enquire about our activities, make a referral for yourself or another person, send or receive an e-mail, donate to us, ask a question, or otherwise provide us with personal information;
- When you provide permission to other organisations to share it with us (including Facebook or Twitter);
- When we collect it as you use our websites;
- When you have given it to a third party and you have provided permission to pass your information on to us, e.g., when you register with a group leader or service provider;
- When a professional refers you to our services.

We combine the information from these sources with the information you provide to us directly. Where you ask us to provide a specific service, you may be asked to give consent to your data being collected. This may be verbally, online or by signed consent form, and this particularly relates to sensitive information you may not want shared.

Your Consent

By providing us with your personal information, including potentially sensitive information, if linked to our services, you consent to the collection and use of this information in accordance with the purposes described in this policy. SMCA may be funded to provide local services by a third party such as the Local Authority which have specific contractual requirements on how data is collected and used. Information may be provided by professionals or referred to us. In these instances, you may not have given formal consent. The information disclosed will be strictly limited to what is required to provide services or to comply with its legal and regulatory requirements.

How we store your personal information

We take appropriate measures to ensure that the personal information disclosed to us is kept secure, accurate, and up to date. We will ensure that your personal information is kept only for so long as is necessary for the purposes for which it was collected and is securely destroyed.

Your information will be protected from unauthorised or accidental disclosure and these principles apply whether we hold your information on paper or in electronic form. However, we cannot guarantee the security of Data in an account from unauthorised entry or use, hardware or software failure, and other factors.

How we use your personal data

Personal information which we hold may be used in several ways. For example:

- to ensure efficient and accurate processing of your request;
- to operate, maintain and improve our services;
- to carry out our obligations arising from any contracts entered into by you and us;
- to process a volunteer or job application;
- to maintain contact with you;
- to send you communications which you have requested and that may be of interest to you;
- to seek your views or comments on the services we provide;
- to notify you of changes to our services;
- to provide services to the wider community;
- for protection of your rights.

The reasons we might share your personal data

We will not disclose your personal information to any organisation or person outside SMCA without your consent, except for the following reasons:

- to the extent that we are required to do so by law;
- to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention);
- to safeguard children and vulnerable adults;
- to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information;
- if we receive a complaint about any content that you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions or if we believe that we need to do so to protect and defend the rights, property, or personal safety of SMCA, our websites or our visitors and for other lawful purposes;
- if we merge with another organisation to form a new entity, information may be transferred to the new entity.

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us on 020 8648 3740 if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at brenda@smca.org.uk

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>

	Future Review Dates					
• Date Implemented	January 2023					
• Date reviewed	2024					
• Date approved By Trustees	January 2023					