



Gwealan Tops Adventure Playground,
School Lane,
Redruth
TR15 2ER
Tel:01209697717
Email:manager@gwealantops.org

DATA PRIVACY NOTICE

Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in Gwealan Tops possession or likely to come into such possession. The processing of personal data is governed by [the General Data Protection Regulation 2016/679 (the “GDPR”)]. More information about the GDPR can be found at the Information Commissioner’s Office at <https://ico.org.uk/>

Who are we?

Gwealan Tops is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

Gwealan Tops complies with its obligations under the GDPR by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes:

- To administer membership records;
- To maintain registration records including emergency contact details, allergies and other relevant health information;
- To enable us to provide a community service for the benefit of local children and families;
- To manage employees and volunteers;
- To fundraise and promote the interests of the charity;
- To maintain our own accounts and records;
- For the prevention of crime and for the wellbeing of children and vulnerable adults in matters relating to Safeguarding;
- To inform individuals of news, events, activities or services running at Gwealan Tops.

The data that we will most likely seek to process is as follows:

- personal information (such as name, contact number, parental details and address);
- characteristics (such as ethnicity, family make up);
- email address for providing news and updates regarding Gwealan Tops.

What is the legal basis for processing your personal data?

Article 6 processing:

Registered Charity Number: 1177542

- Consent of the data subject;
- Processing is necessary for the performance of a contract with the data subject or to take steps to enter into a contract (in matters regarding employees and self-employed contractors);
- Processing is necessary for compliance with a legal obligation;
- Processing is necessary to protect the vital interests of a data subject or another person (particularly in regard to the safety of children);
- It is not expected that Gwealan Tops will be processing special category data which has not been completely anonymised. However, if we are required to do so for a particular reason, for example, grant monitoring, then this will be with the additional demands of Article 9 processing and the legal basis would be:
 - Explicit consent of the data subject;
 - Processing is carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided: -
 - the processing relates only to members or former members (or those who have regular contact with it in connection with those purposes); and
 - there is no disclosure to a third party without consent;
- Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes.

Please note: where the personal data are collected direct from the data subject, the data subject must be informed whether he or she is obliged to provide the personal data and the consequences, if he/she does not provide the data.

Collecting this information

Whilst some information you provide to us is mandatory (i.e. registration details), some of it is provided to us on a voluntary basis. In order to comply with the data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

Sharing your personal data

Your personal data will be treated as strictly confidential and will be shared with Gwealan Tops employees as necessary for the safe and effective running of the Adventure Playground. We will only share your data with third parties outside of the organisation with your consent.

How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for a period of 3 years following your relationship with Gwealan Tops ceasing to be active in order to maintain the records of the Adventure Playground for purposes including reporting to funders; safeguarding; accounting; complaints and legal matters; impact assessment and relationship management.

Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which Gwealan Tops holds about you;

- The right to request that Gwealan Tops corrects any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary for Gwealan Tops to retain such data;
- The right to withdraw your consent to the processing at any time for the data which Gwealan Tops holds on you for which your consent was sought;
- The right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), (where applicable);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to the processing of personal data, (where applicable);
- The right to lodge a complaint with the Information Commissioners Office.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Gwealan Tops Data Protection Trustee: Catriona Venner de Cortez. c/o Gwealan Tops, School Lane, Redruth, TR15 2NR or on tiacatriona@yahoo.co.uk

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.