

## The Pirate Castle, Gilbey's Wharf, Oval Road, London NW1 7EA

<b>Policy Name:</b>	<b>Data Privacy Policy</b>		
<b>Version/ date of issue:</b>	Version 1 – issued May 2018	<b>Reviewed by:</b>	Kal Webb, Development Manager
<b>Last review date:</b>	<b>June 2023</b>	<b>Next review due</b>	June 2024

### 1. **About this Policy**

- 1.1 This policy explains when and why The Pirate Castle collects personal information about our staff and service users, including how we use it, how we keep it secure and associated rights in relation to the personal data held by us.
- 1.2 The Pirate Castle may collect, use and store personal data, as described in this Data Privacy Policy and as described when we collect data from individuals.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website (<https://www.thepiratecastle.org/tcs-policies>) or our internal noticeboard regularly for any amendments.
- 1.4 Our aim is to always to comply with applicable UK Data Protection legislation, including the General Data Protection Regulation (the GDPR) when dealing with personal data. Further details on the GDPR can be found at the website for the Information Commissioner (<https://ico.org.uk>). For the purposes of the GDPR, The Pirate Castle will be the “controller” of all personal data we hold and is registered with the ICO as a Data Controller.

### 2. **Who are we?**

- 2.1 We are The Pirate Castle, a registered charity (number 1138787) and a company limited by guarantee. We can be contacted at Gilbey's Wharf, Oval Road, London, NW1 7EA or on 020 72676605 or at [info@thepiratecastle.org](mailto:info@thepiratecastle.org).

### 3. **What information we collect and why**

We collect the following data from our staff, volunteers and service users:

- Participant information: name, address, telephone number, email address
- Emergency contact details: next of kin and doctor's details in the event of emergencies
- Age of users for Outdoor Education and Canal Boating services
- Details of qualifications held and disclosures (for example kayaking or boating qualifications and DBS checks)
- Details of state financial benefits received (where concessionary rates are applied for)
- Details of health conditions, disability and / or additional support needs (known as 'special category data') where a such a condition may impact upon work undertaken on behalf of The Pirate Castle, service delivery / activity and / or we need to make use of specialist equipment
- Equal opportunities monitoring data including age, ethnic origin and gender

- Bank account details for the purpose of any payments to staff, volunteers or sub-contactors and / or refunds due to service users
- Photographic images and filmed footage of staff, volunteers and / or participants engaging in The Pirate Castle's activities for training purposes and promotional use on The Pirate Castle's website, printed marketing materials and (where appropriate) on the charity's social media channels, where parental/the individual's permission has been given

We process the data on the following grounds:

- Complying with our obligations under contracts, including to you and to our insurers
- Delivering our activities safely and in accordance with the best-practice guidelines of governing bodies
- Providing services to participants with health conditions, disabilities and / or additional support needs
- CCTV footage of external areas for the purpose of security, safety and crime prevention
- Being able to act swiftly and safely in an emergency
- Attracting and delivering services to diverse users
- Securing future funding to deliver the Charity's aims

#### 4. **How we protect personal data**

- 4.1 We will not transfer personal data outside the European Economic Area
- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse and / or unauthorised alteration or destruction in accordance with ICO Data Protection principles
- 4.3 Please note, however, that where you are transmitting information to us over the internet, then given the internet is not a secure medium, we cannot definitely guarantee the security of this information
- 4.4 Special category data is kept in a locked cabinet to which only members of the core Pirate Castle staff team have access. Personal and special category data is only shared with instructors, youth workers or narrowboat skippers responsible for the activity in which the relevant individual is working where information sharing is necessary for the management and safety of services being delivered
- 4.5 Equal opportunities data is processed and reported to our funders and stakeholders only on an anonymised basis. No individual can be identified from the reports
- 4.6 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

#### 5. **Who else has access to the information provided to us?**

- 5.1 We will never sell any personal data provided to us. We will not share any personal data with any third parties without individual's prior consent
- 5.2 If it becomes necessary to pass any personal data to an external third party to enable us to provide products and / or services, we will only ever disclose data that is strictly necessary for the activity and will ensure that there is a data sharing agreement in place to safeguard the security of all shared data

## 6. **How long do we keep personal information?**

- 6.1 We will hold personal data on our systems for as long as individuals remain members of staff, volunteers, subcontractors and / or use our services and for as long afterwards as is necessary to comply with our legal obligations. We will review retained personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing the personal data with the exception of retaining personal data in an archived form in order to be able to comply with future legal obligations, including but not limited to compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.
- 6.2 We securely destroy all personal information once we have used it and no longer need it for legitimate purposes.

## 7. **Personal Data rights**

- 7.1 Individuals have rights under UK data protection law, including:
- (a) to be able to access the personal data held about them by submitting a Subject Access Request
  - (b) to be provided with information about how their personal data is processed
  - (c) to have their personal data corrected if incorrect records are held
  - (d) to have their personal data erased in certain circumstances
  - (e) to object to or restrict how their personal data is processed
  - (f) to have their personal data transferred to themselves or to another business in certain circumstances
- 7.2 If an individual wishes for us to erase the data held about them as outlined in paragraph (3) above then please contact us at [info@thepiratecastle.org](mailto:info@thepiratecastle.org)
- 7.3 If an individual has any concerns about how we process their personal data please contact us at [info@thepiratecastle.org](mailto:info@thepiratecastle.org)
- 7.4 Individuals also have the right to take any complaint about how we process their personal data to the Information Commissioner:

<https://ico.org.uk/make-a-complaint/data-protection-complaints/data-protection-complaints>

Tel: 0303 123 1113  
Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

For more details, please address any questions, comments or requests regarding our data processing practices to our General Manager.