

DATA PRIVACY POLICY

Healthy n Happy Community Development Trust –including its service work streams, CamGlen Bike Town, CamGlen Radio, Number 18, Transforming Communities and Transforming Lives and our Trading Company – Healthy n Happy Enterprises Ltd, are committed to protecting your privacy and take this responsibility very seriously. We therefore take care to safeguard it. This notice outlines what data we collect, how we may use it, how we protect your data and your rights, and how you can exercise those rights.

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 the data controller's 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)

Who are we?

Healthy n Happy Community Development Trust is the data controller this means it decides how your personal data is processed and for what purposes. Healthy n Happy is a Scottish registered charity (no. SC032654) and company limited by guarantee (no. SC227276). The registered address is Aspire Building, 16 Farmeloan Road, Rutherglen, Glasgow, G73 1DL.

Why do we collect your data?

We collect personal data for many reasons, including to provide you with services, communicate with you and send you information you have requested. Depending on how you interact with us, we may process data for the following reasons:

- To administer membership records
- To manage our employees and volunteers
- To maintain our own accounts and records
- To process donations and administer Gift Aid information for any donation you make to Healthy n Happy
- To operate the Healthy n Happy, CamGlen Bike Town, CamGlen Radio, Number 18 and CamGlen Communities websites
- To deliver our services, activities, events, training and respond to individuals who have requested these services and information
- To inform individuals of our news, events, activities or services related to Healthy n Happy it's projects and membership
- To conduct surveys, research and gather feedback
- To comply with applicable laws and regulations, and requests from statutory agencies
- To comply with our contractual obligations to our funders.

When do we collect information from you?

We obtain information about you when you:

- Contact Healthy n Happy for information on our services and activities
- Become a Healthy n Happy participant
- Attend a Healthy n Happy event or activity
- Apply for membership of Healthy n Happy

- Apply for employment with Healthy n Happy
- Sign up for our Healthy n Happy and Bike e-newsletters
- Complete our surveys
- Contribute financially, fundraise on our behalf or enter into a prize draw
- Use our websites

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, we will require your parent/guardian's permission beforehand whenever you provide us with personal information

Information we collect

The personal information that Healthy n Happy collects varies depending on the individual's engagement and participation with the organisation.

For all types of engagement and participation the information we collect for an individual includes:

- Name
- Contact address
- Contact telephone numbers (including mobiles)
- Email

Depending on the nature of the individual's participation and engagement Healthy n Happy may also collect the following information:

- Date of birth
- National Insurance number
- Bank details
- Records of your correspondence and engagement with us
- Donation history and Gift Aid details
- Information you may enter on the Healthy n Happy, CamGlen Bike Town, CamGlen Radio, Number 18, CamGlen Communities websites
- Photographs, video or audio recordings
- Occupation
- Biographical information
- Monitoring and evaluation data
- Other information you share with us

This information may be collected via:

- Any paper forms you complete
- Any telephone, webchat or email conversations, or face-to-face interactions
- Digital forms completed via our website, or online surveys
- Third-party companies and websites such as Just Giving, BT My Donate, Easy Fundraising and Amazon Smile
- Publicly available sources
- Communication via social media

We sometimes also collect sensitive, personal data about individuals. This includes information about health, religion, sexuality, ethnicity, political and philosophical beliefs, and criminal records. We will normally only record this data where we have your explicit consent, unless we are permitted to do so in other circumstances under data protection law.

Using your personal data

If you are participating in any of our activities, volunteering with us, or if someone else has referred you to us for such a service, we will need to process your data because of your specific relationship with us.

We will keep all your relevant personal information – including notes, letters and information given to us about you – in a confidential record that is specific to you. We use an electronic case management system (customer relationship management system (CRM) or other electronic systems, depending on the service) as well as paper records to support our advice, guidance and support provision. This means that we can keep the information you provide us, so we are able to see the history and relevant details of your situation. This ensures that we provide appropriate and accurate information, advice and/or support. We take information security very seriously. No one is allowed access to our system or files unless they need this to provide the service to you, or for one of the other purposes discussed in this notice.

Where our funders require it as a condition of our contract with them, we may use your data in reports to them. Typically this is so that they can monitor the outcomes of the help we have provided to you, to ensure we are meeting the term of our contract with them.

We may use your data for general statistical reports. These statistics will not include any information that could be used to identify any individual.

Fundraising, campaigning and direct marketing

We would love to keep you up to date with all our news, activities and events.

We use a range of channels to contact our members, participants and supporters – including our websites, e-newsletters, face-to-face engagement, direct mail, SMS/text campaigns, email, and telephone.

We will obtain your consent to contact you by email and text message.

We send the following marketing materials:

1. **Updates about Healthy n Happy's work:** including our Healthy n Happy and Bike Town e-newsletters, leaflets, and other publications informing you about our activities, services and events
2. **Appeals and fundraising activities:** including requests for donations, how you can raise money on our behalf, attend or take part in a fundraising event, communications relating to our fundraising activities, and updates on the impact that your fundraising activities have had on our work
3. **Events:** details of any Healthy n Happy events such as local community activities and our AGM. Please note that if you sign up to a Healthy n Happy event, we will also send you administrative communications confirming details of the events. On occasion we will also send you a reminder about the same event in future years, in case you want to participate in it again.
4. **Bike Town products:** including information about products offered in our Bike Town shop
5. **Number 18:** including information about how to hire the facility space and advertising on the range of activities and events offered from the facility.

We will **never** share or sell your personal data to a third-party organisation for its marketing, fundraising or campaigning purposes.

You can withdraw your consent, unsubscribe from or update your marketing preferences at any point by emailing your request to enquiries@healthynhappy.org.uk.

Any electronic communications, such as emails, will have a link to unsubscribe from future electronic communications, so you can manage your own communication preferences.

If you make any changes to your consent, we will update your record as soon as we possibly can. Email communications will, however, be stopped immediately. If you tell us you do not wish to receive marketing, fundraising or campaign communications, you may still receive transactional and service-based communications confirming and servicing other relationships you have with us (as described below).

Administrative communications to supporters

In addition to the fundraising and marketing communications that you receive from Healthy n Happy, we will also communicate with you by post, telephone, and email in relation to administrative and transactional matters required to deliver our services, activities, events, training and in order to respond to individuals who have requested these services and information. For example, we may contact you about an event, course or activity that you have signed up to participate in.

As mentioned above, we may still need to communicate with you for administrative purposes even where you have opted out of marketing communications from us.

Healthy n Happy Enterprises Trading (including Bike Town shop and Number 18)

When you purchase an item from our Bike Town shop, hire the space or pay for an activity in Number 18 or make a donation, we may collect certain information from you including: your name, address, phone number, email address, Gift Aid information, marketing preferences, and payment details – so that we can process your purchase or contact you if we have any queries regarding your purchase, or donation.

When you provide Healthy n Happy Enterprises (Healthy n Happy's wholly owned trading subsidiary) with your data, it is held and processed by Healthy n Happy Enterprises and Healthy n Happy.

Social Media and Digital Media

Depending on your settings or the privacy policies for social media messaging services like Facebook, Twitter, and Instagram, you may receive targeted advertisements through our use of social media audience tools. For example, Facebook's 'Custom' and 'Lookalike' Audiences' programmes enable us to display adverts to our existing supporters when they visit Facebook, or other people who have similar interests or characteristics to our supporters. We may provide your data (including your email address) to Facebook, so it can determine whether you are a registered account holder with them, or so that Facebook create a 'lookalike' audience. Our adverts may then appear when you access Facebook. We only work with social media networks that provide a facility for secure and encrypted upload of data, and immediately delete any records not matching with their own user base. For more information, or to manage your social media ad preferences, please see Facebook's ['About Custom Audience'](#) guide and its [Data Policy](#).

Like many other websites the Healthy n Happy, CamGlen Bike Town, CamGlen Radio, Number 18, CamGlen Communities websites use cookies. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our websites.

A cookie is a small file of letters and numbers that we may store on your browser or the hard drive of your computer or device. They cannot be used to identify you personally.

Our websites are hosted by Kualo (www.kualo.co.uk) and Wix (www.wix.com). You can access their privacy policies here <https://www.iubenda.com/privacy-policy/698140/legal> and <https://www.wix.com/about/privacy>

We use information in the following ways:

1. Administer the Site and to help you use the Site
2. To carry out statistical analysis on the site usage using Google Analytics.

Google Analytics is a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "Cookies", text files that are stored on your computer and enable analysis of your use of the website. The information generated by the cookie about your use of this website is usually transmitted to a Google server in the USA and stored there. If you enable IP anonymization on this website, your IP address from Google will be truncated within Member States of the European Union or other parties to the Agreement on the European Economic Area. Only in exceptional circumstances will the full IP address be transmitted to a Google server in the USA and shortened there. By order of the operator of the website, Google will use this information to evaluate your use of the website, compile reports on website activity, and provide other services regarding website and internet use to the website operator.

The IP address transmitted by your browser as part of the Google Analytics will not be merged with other data from Google. You may block cookies from being stored by adjusting the settings in your browser software; however, we would like to point out that in this case, you may not be able to use all of the features on this website to their full extent. You can also block the collection of the data generated by the cookie and the data related to your use of the website (incl. your IP address) to Google as well as the processing of this data by Google, by downloading and installing a browser plugin available from the following link: <https://tools.google.com/dlpage/gaoptout?hl=en>.

You can view Google Analytics privacy policy here: <https://support.google.com/analytics/answer/6004245?hl=en>.

Applying for a job with Healthy n Happy

When you apply for a job with us, your personal data will be collated to monitor the progression of your application, and the effectiveness of the recruitment process through the statistics collected. Where we need to share your data, such as for gathering references or obtaining a Disclosure Scotland check (depending on the role), you will be informed beforehand, unless the disclosure is required by law. These checks are only done after a position has been offered only to the successful candidate. On the application form, you are asked to complete the referee details, and can tick permission to contact referee. If tick yes, once offered a role, we will automatically send out reference requests. If you tick no, we will contact successful candidates for permission first.

Personal data about unsuccessful applicants are held no longer than 6 months after the recruitment exercise is complete for that vacancy. You, as an applicant, can ask us to remove your data before this time if you do not want us to hold it.

Once you have taken up employment with Healthy n Happy, we will compile a file relating to your employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to your employment. Once your employment with us has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it from our files.

Professional contacts

We may collect data about professional contacts and partners with whom we work. Personal data collected in this way will be processed in accordance with data protection legislation and this policy.

We may send our professional partners information and updates about our work (primarily by email). Such contacts can opt out of receiving this information at any time.

We maintain a record of information related to MPs and other holders of public office, to enable us to undertake our campaigning activity in furtherance of our charitable aims. This will include keeping a record of contact details such as

address, telephone number and email address as well as publicly available voting records and committee and group memberships.

Our legal basis for processing personal data

We need a lawful basis to collect and use your personal data under data protection law. The law allows for six ways to process personal data (and additional ways for sensitive personal data). Four of these are relevant to the types of processing that we carry out.

This includes information that is processed on the basis of:

1. A person's consent (for example, to send you our Healthy n Happy and Bike Town e-newsletters)
2. A contractual relationship (for example, to provide you with goods or services that you have purchased from us)
3. Processing that is necessary for compliance with a legal obligation (for example to process a Gift Aid declaration)
4. Healthy n Happy's legitimate interests (please see below for more information)

Personal data may be legally collected and used if it is necessary for a legitimate interest of the organisation using the data, if its use is fair and does not adversely impact the rights of the individual concerned.

When we use your personal information, we will always consider if it is fair and balanced to do so and if it is within your reasonable expectations. We will balance your rights and our legitimate interests to ensure that we use your personal information in ways that are not unduly intrusive or unfair.

Our legitimate interests include:

- Charity Governance: including delivery of our charitable purposes, statutory and financial reporting and other regulatory compliance purposes.
- Administration and operational management: including responding to solicited enquires, providing information and Healthy n Happy services, research, events management, the administration of volunteers and employment, and recruitment requirements

Disclosure of your personal data. We will not share any of your personal data to any third party – except where:

- The transfer is to a secure data processor, which carries out data processing operations on our behalf (for example Just Giving and BT My Donate)
- We are required to do so by law, for example to law enforcement or regulatory bodies where this is required or allowed under the relevant legislation
- We are required to do so because it is a condition of our funding or service provision that we share certain information with the funder or with partnership organisations. We will tell you if this is the case.
- It is necessary to protect the vital interests of an individual
- We have obtained your consent to do so.

We will never share or sell your personal data to a third-party organisation for marketing, fundraising, or campaigning purposes.

Transfers of data outside of the European Economic Area

We use Microsoft Office 365 products, which are multi-tenant cloud services, for our internal office use. This means that internal documents and information generated by us are stored in cloud services hosted within the European Economic Area (EEA).

Retention of your data

Whatever your relationship with us, we will only store your information for a specified amount of time, as set out in our internal data retention policy.

The length of time that data will be kept may depend on the reasons for which we are processing the data and on the law or regulations that the information falls under, such as financial regulations, Limitations Act, Health and Safety regulation or any funding obligations we may have.

Subject to the above, we will typically store data relating to people to whom we provide services 6 years after completion of those services. HR data is kept for a period of 6 years following the termination of employment; personal financial data will be destroyed after 2 years; Health and Safety information will be held according to statutory requirements.

Once the retention period has expired, the information will be confidentially disposed or permanently deleted, or anonymised.

If you request to receive no further contact from us, we will keep some basic information about you on our suppression list to avoid sending you unwanted materials in the future.

Your Rights

You have many rights under data protection legislation. These include:

1. *Right of Access*

You have the right to know what information we hold about you and to ask, in writing, to see your records.

We will supply any information you ask for that we hold about you as soon as possible, but this may take up to 30 days. We will not charge you for this other than in exceptional circumstances. You will be asked for proof of identity as the person dealing with your request may not be the staff member you have met before. We need to be sure we are only releasing your personal data to you.

This is called a data subject access, and can be done by emailing enquiries@healthynhappy.org.uk or writing to Executive Director, Healthy n Happy Community Development Trust, Aspire Building, 16 Farmeloan Road, Rutherglen, Glasgow, G73 1DL.

2. *Right to be informed*

You have the right to be informed how your personal data will be used. This policy, as well as any additional information or notice that is provided to you either at the time you provided your details, or otherwise, is intended to provide you with this information.

3. *Right to withdraw consent*

Where we process your data based on your consent (for example, to send you our Healthy n Happy and Bike Town e-newsletters), you can withdraw that consent at any time. To do this by using the link found at the bottom of every email or by emailing your request to enquiries@healthynhappy.org.uk.

4. *Right to object*

You also have a right to object to us processing data where we are relying on it being within our legitimate interests to do so. To do this, or to discuss this right further with us, please contact us using the details in the 'Contact us' section below.

5. Right to restrict processing

In certain situations, you have the right to ask for processing of your personal data to be restricted because there is some disagreement about its accuracy or legitimate usage.

6. Right of erasure

In some cases, you have the right to be forgotten (i.e. to have your personal data deleted from our database). Where you have requested that we do not send you marketing materials, we will need to keep some limited information to ensure that you are not contacted in the future.

7. Right of rectification

If you believe our records are inaccurate, you have the right to ask for those records concerning you to be updated. To update your records, please get in touch with us using the details in the 'Contact us' section below.

8. Right to data portability

Where we are processing your personal data because you have given us your consent to do so, you have the right to request that the data is transferred from one service provider to another.

You can find detailed information about your rights under UK Data Protection legislation on the UK Information Commissioner's website: www.ico.gov.uk

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.

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Complaints

If you have any complaints about the way in which we have used your data, please get in touch with us using the details in the 'Contact us' section below. We would be happy to help and discuss your concerns.

In addition, you are also entitled to make a complaint to the [Information Commissioner's Office](http://www.ico.gov.uk) and [OSCR](http://www.oscr.org.uk).

Contact Us

If you have any questions about this policy, would like more information, or want to exercise any of the rights set out above, you can get in touch with us in the following ways:

1. Email: enquiries@healthynhappy.org.uk
2. Phone: 0141 646 0123
3. Post: Healthy n Happy Community Development Trust, Aspire Building, 16 Farmeloan Road, Rutherglen, Glasgow, G73 1DL

APPENDIX 1: REQUESTING CONSENT

1. Registering as a participant

If you are registering your details as a participant with Healthy n Happy, our forms will ask for your consent:

So we can provide the best service possible, Healthy n Happy will collect and use relevant information about you and your situation. We will only keep information that is relevant to the type of involvement you have with the organisation. By signing this form, you consent to Healthy n Happy holding and processing your personal data according to our Privacy Policy found on our website. You can withdraw your consent at any time by contacting enquiries@healthynhappy.org.uk

2. Registering for our e-newsletters or to be kept up to date with local community events

All documents and websites that provide the opportunity to subscribe to our e-newsletters and local community event invitations will ask you for your consent:

By signing up you are giving us consent for Healthy n Happy to send you our e-newsletter which will keep you up to date with all our news, activities and events or a text invite that will keep you up to date with all the up and coming community events. You can unsubscribe at any time by using the link found at the bottom of every email or by emailing your request to enquiries@healthynhappy.org.uk

3. Completing a community survey

Our surveys are always anonymised however we may ask you if you would like to enter a prize draw, register to be kept up to date with local community activities/events and/or register interest in becoming a community volunteer. We will ask you for your consent:

Information/events register

You have selected yes to enter a prize draw and be kept up to date with local events and activities. Healthy and Happy Community will keep your data according to our Privacy Policy found on our website, for the purpose of the prize draw and will also add your contact details to a central database in order to keep you up to date according to your preferences. You can request to be removed at any time by emailing enquiries@healthynhappy.org.uk

Prize draw only

You have selected yes to enter a prize draw only. Healthy and Happy Community will keep your data according to our Privacy Policy found on our website, for the purpose of the prize draw and thereafter will not be held by the organisation and will be destroyed.

We will always record the date you gave your consent and how you did this.