

## Privacy Policy

### 1. About this Policy

- 1.1. ReachOut is committed to respecting your privacy. This notice is to let you know how we promise to look after your personal information, what your privacy rights are and how the law protects you.
- 1.2. We promise:
  - 1.2.1. To keep your data safe and secure;
  - 1.2.2. Not to sell your data;
  - 1.2.3. To enable you to update or amend your marketing preferences.
- 1.3. Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services you may request from us. This also includes the safe delivery of any events you may attend or just managing our relationship with you.
- 1.4. This privacy notice sets out how we will look after your personal data when we hold or use it as a data controller, in compliance with the [Data Protection Act 2018](#) ("DPA"), the "[UK GDPR](#)" as defined in the DPA ("[GDPR](#)") and all relevant UK data protection legislation. In particular, it sets out in detail:
  - 1.4.1. what information we hold about you (such as your contact details, address, etc.);
  - 1.4.2. how your personal information may be used and the reasons for these uses;
  - 1.4.3. details of your rights.
- 1.5. Where we collect personal information from you directly, we will provide this privacy notice at the time we collect the information from you. We may do so by giving you this privacy notice or by providing a link to it on our website. Where we receive your personal information indirectly, we will provide this privacy notice when we first contact you, first pass the data to someone else or within a month, whichever is earlier. If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us.
- 1.6. We will only provide this privacy notice to you once, generally at the start of our relationship with you. However, if the applicable privacy notice is updated substantially, then we may provide you with details of the updated version. In any event, you are encouraged to check back regularly on our website ("Site") for updates at [www.reachoutuk.org](http://www.reachoutuk.org).

### 2. Who we are

- 2.1. References to **we**, **our** or **us** in this privacy notice are to the entity of ReachOut Youth, incorporated and registered in England and Wales with company number 04604379 and charity number 1096492. ReachOut Youth is registered with the Information Commissioner's Office as a Data Controller – registration number Z8938339.
- 2.2. The Head of Operations & Finance is our Data Protection Officer and has overall responsibility for data protection compliance across the organisation. Contact details are set out in the "Contacting Us" section at the end of this privacy notice.

### 3. Personal Information we may collect from you

3.1. When you have an interaction with us you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- 3.1.1. personal contact details that allow us to contact you directly, such as name, title, job role, address, email addresses and telephone numbers;
- 3.1.2. your organisation details, such as a school, company or other organisation type;
- 3.1.3. records of your interactions with us such as telephone conversations, emails and other correspondence such as chat text from any online mentoring sessions; and your instructions to us;
- 3.1.4. financial details, such as any credit/debit card and other bank/payment details you provide so that we can receive payments from you or make payments to you, details of any financial transactions with you, and insurance;
- 3.1.5. use of and movements through our online systems, passwords, IP addresses, user names and other IT system identifying information;
- 3.1.6. records of your attendance at any events (including conferences, training courses, workshops) or participation in any programmes or interventions associated with us;
- 3.1.7. images in video and/or photographic form and voice recordings; and
- 3.1.8. your marketing preferences so that we know whether and how we should contact you.

3.2. If you are involved in one of our events or participate in one of our programmes in any capacity (including, but not limited to: participant, project leader, volunteer, mentor etc...) you may also provide us with or we may obtain the following additional **personal information** from you:

- 3.2.1. identification documents, such as passport, driving licence and identity cards etc...;
- 3.2.2. professional details, such as qualifications, accreditations and experience;
- 3.2.3. school information, including schools attended, grades, additional needs;
- 3.2.4. contact details of others, such as parents/guardians, next of kin, family members, carers and emergency contacts;
- 3.2.5. specific details, such as gender, date of birth, and preferences;
- 3.2.6. travel information.

### 4. Special Categories of Personal Information

4.1. We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- 4.1.1. information about your race or ethnicity, religious beliefs, sexual orientation and gender identity;
- 4.1.2. information about your health, including any disabilities, medical conditions and history, injuries, allergies, medication, immunisations and health professional information; and
- 4.1.3. dietary and access requirements.

4.2. We may not collect all the above types of special category personal information about you. In relation to the special category personal data that we process, we do so on the basis that:

- 4.2.1. you have given explicit consent (e.g. by providing that information to us);
- 4.2.2. the processing is necessary for reasons of substantial public interest – equality of opportunity or treatment;
- 4.2.3. the processing is necessary for the establishment, exercise or defence of legal claims;
- 4.2.4. the processing is necessary for the provision of health care or treatment; or
- 4.2.5. the processing is necessary for scientific research or statistical purposes in the public interest.

4.3. In the table below, we refer to these as the “special category reasons for processing of your personal data”.

4.4. We may also collect criminal record information from you. For criminal records history, we process it on the basis of legal obligations.

## 5. Where we collect your information

- 5.1. We typically collect personal information when you: sign up for/attend one of our programmes or events; undertake any work for us; make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.
- 5.2. If you are a pupil at a school we also may collect personal information about you from a teacher at your school.
- 5.3. If you are providing us with details of parents/guardians, next of kin, family members, coaches, carers or emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

## 6. Uses made of the information

6.1. The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal Information Uses	Lawful Basis
To administer our partnership or account(s) you have with us, manage our relationship with you and deal with payments and any support, service or product enquiries made by you.	All contact, organisation and partnerships details.  Financial details, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer our partnership contract and/or accounts with us.
To send you information as part of our partnerships which includes events, news, programme information and publications.	All contact, organisation and partnerships details.	This is necessary to enable us to properly manage and administer our partnership contract and/or accounts with us.
To arrange and manage any contracts for the provision of any products and/or services by us.	All contact, organisation and partnerships details.  Financial details, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer our partnership contract and/or accounts with us.
To arrange and manage any contracts for the provision of any	All contact, organisation and	This is necessary to enable us to properly administer and

products and/or services by you.	partnerships details.  Financial details. Professional details.	manage any contract with you. We have a legitimate interest in ensuring you are competent to provide the products/services.
To administer and manage your attendance at events or participation in programmes/interventions.	All contact, organisation and partnerships details.  Identity documents, professional details, specific details, contact details of others, travel information.	We have a legitimate interest in ensuring that we properly administer, manage and deliver our events and programmes/interventions and discharge our duty of care obligations.
To use information about your physical or mental health or disability status and your requirements, to ensure your health and safety when attending any event or participating in one of our programmes/ interventions.	Health and medical information.  Dietary or access requirements.	We process special category personal data on the basis of explicit consent and/or it being necessary for the (potential) provision of health care or treatment.
To arrange for any trip or transportation to and/or from an event.	Identification documents, contact details of others, health and medical information.	We have a legitimate interest in making the necessary arrangements for the trip and/or transportation to the event.  We process special category personal data on the basis of explicit consent and/or it being necessary for the (potential) provision of health care or treatment.
To conduct monitoring, research and evaluation of our work.	All contact, organisation and partnerships details.  Records of your attendance/ participation.  Specific details.  Information about your race, ethnicity, religious beliefs, sexual orientation.  Health and medical information.	We have a legitimate interest in doing so to ensure that we can monitor our reach, assess the impact of our work and inform the future development of programmes, interventions and events.  We process special category personal data on the basis of explicit consent and/or for scientific research or statistical purposes in the public interest.
For the purposes of equal opportunities monitoring.	Name, title, date of birth, gender, information about your race, ethnicity, religious beliefs, sexual orientation, health and medical information.	We have a legitimate interest to promote an environment that is inclusive, fair and accessible.  We process special category personal data on the basis of explicit consent and/or for reasons of substantial public interest – equality of opportunity or treatment.
To comply with legal obligations, for example, regarding people working with children or adults at risk to comply with our safeguarding requirements.	Information about your criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations.
To answer your queries or	Contact and organisation details	We have a legitimate interest

complaints.	and records of your interactions with us.	to provide complaint handling services to you in case there are any issues with the services we provide.
For the purposes of promoting and marketing our work.  (Adults, 18 years of age and above)	Images in video and/or photographic form, and voice recordings.	We have a legitimate interest to promote and market our work, including through the use of images of individuals participating in our programmes or attending our events.  However, you always have a choice and an opt-out process will be provided.  For specific photo/video shoots we will obtain your consent.
For the purposes of promoting and marketing our work.  (Young people, under 18 years of age)	Images in video and/or photographic form, and voice recordings.	For young people aged 13 and over - where we have obtained parental and the young person's consent to do so.  For young people under the age of 13 - where we have obtained parental consent.
The security of our IT systems.	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To send you other marketing information we think you might find useful or which you have requested from us, including news and updates, funded opportunities (programmes and interventions), products and services (including events, and partner promotions), and fundraising opportunities.	All contact, organisation and partnership details.  Marketing preferences	We believe that we can demonstrate that we have a legitimate interest to send you certain marketing information, however you are able to select your marketing preferences.  You always have a choice and you may unsubscribe or change your preferences at any time through our online preference centre.
Retention of records.	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records to properly administer and manage our relationship with you and in some cases, we may have legal or regulatory obligations to retain records.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2

		<p>above.</p> <p>For criminal records history we process it on the basis of legal obligations.</p>
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- 6.2. We will use your personal information as described in this privacy notice, but, for example, we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy to be contacted for these purposes.
- 6.3. For some of your personal information you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly discharge our contractual obligations or comply with legal obligations. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to deliver our products or services to you.
- 6.4. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting Us**" section below.
- 6.5. Withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

**7. Direct Marketing**

- 7.1. **Email, post and SMS marketing:** Our communications are grouped into 5 categories: news and updates; fundraising opportunities; funded opportunities; products and services; and research and insight. On initial registration/sign-up you are given the opportunity to select which categories, if any, you would like to receive information about.
- 7.2. You can update your preferences at any time by using the link we will send you or by logging into our website and choosing "Update Communication Preferences" in our portal. You can also change your preferences by clicking on the "update subscription preferences" link at the bottom of any email marketing communications that we send to you.

**8. Disclosure of your personal information**

- 8.1. Details of how we disclose your personal information are set out below, but generally it is where we need to do so in order to run our organisation or to deliver our goods, services, programmes and events to you. In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.
- 8.2. We do not sell, trade or rent your personal information to others.
- 8.3. We may share personal information with the following parties:
  - 8.3.1. Any party approved by you.

- 8.3.2. Our Funders
- 8.3.3. Our supply chain partners & sub-contractors: for example, project leaders, mentors, research/evaluation contractors, venues
- 8.3.4. IT system providers: including Salesforce, i-Team, websites, video and teleconference services
- 8.3.5. Our fulfilment and distribution sub-contractors: such as couriers, import/export agents, shippers
- 8.3.6. Our advisors and insurers: to enable us to take professional advice or arrange insurance as required
- 8.3.7. The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives
- 8.3.8. Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security

8.4. We do not disclose personal information to anyone else except as set out above, without your explicit consent.

## **9. Storage and transfer of your personal information internationally**

- 9.1. The personal information we collect will be stored on servers located within the UK.
- 9.2. We do not routinely transfer personal information outside of the UK, but our website and online resources are accessible from outside of the UK.
- 9.3. In exceptional circumstances, we will only transfer your personal information outside of the UK:
  - 9.3.1. Where the transfer is to a place regarded by the UK as providing adequate protection for your personal information.
  - 9.3.2. Where we have put in place appropriate safeguards that have been adopted by the UK or a relevant data protection authority, equivalent to UK GDPR standards.
- 9.4. For further details please contact us by using the details set out in the "**Contacting Us**" section below.

## **10. How long do we keep personal information for?**

- 10.1. The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you, however, we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier. In some cases, personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of up to seven years after your last contact with us. Exceptions to this rule are:
  - 10.1.1. All special category data will be deleted or irreversibly anonymised within three months of the date of the event or programme/intervention for which it was collected.
  - 10.1.2. Images (including any associated consents) will generally be retained for a period of up to 5 years after we have obtained them. Exceptions to this are for images that are identified as being of particular significance, where ReachOut has established a legitimate interest to retain them to ensure we have a historical record of our work.

- 10.1.3. Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after your interaction with us.
- 10.2. It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address, by contacting us using the details set out in the "Contacting Us" section below.

## 11. Your rights in relation to your personal information

- 11.1. You have the following rights in relation to your personal information:
- 11.1.1. All the right to be informed about how your personal information is being used;
  - 11.1.2. the right to access the personal information we hold about you;
  - 11.1.3. the right to request the correction of inaccurate personal information we hold about you;
  - 11.1.4. the right to request the erasure of your personal information in certain limited circumstances;
  - 11.1.5. the right to restrict the processing of your personal information where certain requirements are met;
  - 11.1.6. the right to object to the processing of your personal information;
  - 11.1.7. the right to request that we transfer elements of your data to you or another service provider; and
  - 11.1.8. the right to object to certain automated decision-making processes using your personal information.
- 11.2. Some of these rights, for example, the right to require us to transfer your data to another service provider or the right to object to automated decision-making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision-making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.
- 11.3. To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting Us**" section 15 below. You can also unsubscribe from any **direct marketing** as set out in section 5 above.
- 11.4. If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. Whilst this privacy notice sets out a general summary of your legal rights with respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to help and would encourage you to contact us to resolve your complaint first.

## 12. Monitoring & Review

- 12.1. Our Site may, from time to time, contain links to and from other websites associated with our work or the work of our partners. If you follow a link to any of these websites, please note that



these websites have their own privacy policies, and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies, and you should check these policies before you submit any personal information to these websites.

- 12.2. In addition, if you linked to our Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third-party site and contact its owner or operator if you have any concerns or questions.

### 13. Security

- 13.1. We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

### 14. Cookies (relevant to users of our site)

- 14.1. Certain parts of our Site use "cookies" to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer's hard drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.
- 14.2. We use cookies on our Site to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the Site you are visiting and to recognise you when you return to the Site. Reading cookies does not give us access to other information on your computer's hard drive and our Site will not read cookies created by other websites that you have visited.
- 14.3. You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the Site. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the Site.
- 14.4. Please note providers of third-party content may also use cookies over which we have no control. For detailed information on the cookies we use and the purposes for which we use them see the table below.

Cookie	Used By	Description	Expiration
_utma _utmb _utmc _utmz	Google Analytics	Stores the number of visits of a user, the time of their first visit, the previous visit, and the current visit. It does not contain any personal information and is used only for analytical purposes.	2 years from set/update
__utmz	Google Analytics	This performance cookie stores where a user came from (eg. search engine, search keyword, link).	6 months from set/update
_ga and _gid	Google Analytics	Used to distinguish between website users in Google Analytics.	2 years and 2 hours
_gat_UA-62115691-1	Google Analytics	Used to moderate calls to the	1 minute

		Google Analytics service.	
IDE, DSID, _ct_rmm	DoubleClick.net	These cookies are managed by DoubleClick, an advertising platform we use to display adverts. They help us identify which visitors to our website have seen or clicked one of our adverts.	2 years from set/update
RITCookie	Website	Stores whether the user has accepted the cookie message or not.	365 days
ASP.NET_SessionId	Website	Used for authenticating a user's session after logging in. Closes when you exit the browser.	End of session
ARRAffinity	Website	Tells our infrastructure which server to handle the request.	End of session
MemberLoggedIn	Website	A binary flag which stores whether a user is logged in or not	End of session
ai_session and ai_user	Website	Tracks users as they navigate the website predominately for infrastructure performance insights.	1 day
__cfduid	CloudFlare	Identify individual clients behind a shared IP address and apply security settings on a per-client basis	365 days

14.5. We use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at: <https://www.google.com/policies/privacy/>.

## 15. Log Files (relevant to users of our site)

- 15.1. In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring/exit pages and date/time stamp. Our site also uses a media logging audit to track downloads from the website.
- 15.2. We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.


## 16. Changes to this notice

16.1. We may update this privacy notice from time to time. Any changes we may make to this privacy notice in the future will be posted on our Site and, where appropriate, notified to you by e-mail. When we change this privacy notice materially, we will update the version and approval date at the bottom of this page. Please check back frequently to see any updates or changes and should you object to any alteration, please contact us as set out in the "Contacting Us" section below.

## 17. Contacting Us

17.1. In the event of any query or complaint about the information we hold about you, please

email [info@reachoutuk.org](mailto:info@reachoutuk.org) or write to us at our head office address  
<https://www.reachoutuk.org/contact/>.

Signed	
Name	Jo Amand
Title	Head of Operations & Finance
Date	25 <sup>th</sup> March 2024
Updated	25 <sup>th</sup> March 2024
Next Review	February 2026