**Privacy Policy**

**1. Introduction**

1.1 We are committed to safeguarding the privacy of our website visitors and

service users.

1.2 This policy applies where we are acting as a data controller with respect to

the personal data of our website visitors and service users; in other words,

where we determine the purposes and means of the processing of that

personal data.

1.3 We use cookies on our website. Insofar as those cookies are not strictly

necessary for the provision of our website and services, we will ask you to

consent to our use of cookies when you first visit our website.

1.4 Our website incorporates privacy controls which affect how we will process

your personal data. By using the privacy controls, you can specify whether

you would like to receive direct marketing communications.

1.5 In this policy,

"we", "us" and "our" refer to The Cwmbran Centre for Young People. [For more information about us, see Section 13.]

**2. Credit**

2.1 This document was created using a template from SEQ Legal

(https://seqlegal.com/free-legal-documents/privacy-policy).

**3. How we use your personal data**

3.1 In this Section 3 we have set out:

(a) the general categories of personal data that we may process;

(b) the purposes for which we may process personal data; and

(c) the legal bases of the processing.

3.2 We may process data about your use of our website and services ("**usage**

**data**"). The usage data may include your IP address, geographical location,

browser type and version, operating system, referral source, length of visit,

page views and website navigation paths, as well as information about the

timing, frequency and pattern of your service use. The source of the usage

data is our analytics tracking system. This usage data may be processed for

the purposes of analysing the use of the website and services. The legal basis

for this processing is consent OR our legitimate interests, namely monitoring

and improving our website and services.

3.3 We may process your account data ("**account data**"). The account data may

include your name and email address. The source of the account data is you.

The account data may be processed for the purposes of operating our

website, providing our services, ensuring the security of our website and

services, maintaining back-ups of our databases and communicating with you.

The legal basis for this processing is consent OR our legitimate interests,3.4 3.5 3.6 3.7 3.8 namely the proper administration of our website and business OR the performance of a contract between you and us and/or taking steps, at your

request, to enter into such a contract.

We may process your personal data that are provided in the course of the use

of our services ("**service data**"). The service data may include your name,

telephone number, email address and home address. The source of the

service data is you. The service data may be processed for the purposes of

operating our website, providing our services, ensuring the security of our

website and services, maintaining back-ups of our databases and

communicating with you. The legal basis for this processing is consent OR our

legitimate interests, namely the proper administration of our website and

business OR the performance of a contract between you and us and/or taking

steps, at your request, to enter into such a contract.

We may process information that you post for publication on our website or

through our services ("**publication data**"). The publication data may be

processed for the purposes of enabling such publication and administering our

website and services. The legal basis for this processing is consent OR our

legitimate interests, namely the proper administration of our website and

business OR the performance of a contract between you and us and/or taking

steps, at your request, to enter into such a contract.

We may process information contained in any enquiry you submit to us

regarding services ("**enquiry data**"). The enquiry data may be processed for

the purposes of offering, marketing and selling relevant services to you. The

legal basis for this processing is consent.

We may process information relating to our customer relationships, including

customer contact information ("**customer relationship data**"). The

customer relationship data may include your name, your employer, your job

title or role, your contact details, and information contained in

communications between us and you. The source of the customer relationship

data is you. The customer relationship data may be processed for the

purposes of managing our relationships with customers, communicating with

customers, keeping records of those communications and promoting our

products and services to customers. The legal basis for this processing is

consent OR our legitimate interests, namely the proper management of our

customer relationships.

We may process information relating to transactions, including purchases of

services, that you enter into with us and/or through our website

("**transaction data**"). The transaction data may include your contact details,

your card details and the transaction details. The source of the transaction

data is you and/or our payment services provider. The transaction data may

be processed for the purpose of supplying the purchased services and

keeping proper records of those transactions. The legal basis for this

processing is the performance of a contract between you and us and/or taking

steps, at your request, to enter into such a contract and our legitimate

interests, namely the proper administration of our website and business.3.9 3.10 3.11 3.12 3.13 3.14 **4.** 4.1 4.2 We may process information that you provide to us for the purpose of

subscribing to our email notifications and/or newsletters ("**notification**

**data**"). The notification data may be processed for the purposes of sending

you the relevant notifications and/or newsletters. The legal basis for this

processing is consent OR the performance of a contract between you and us

and/or taking steps, at your request, to enter into such a contract.

We may process information contained in or relating to any communication

that you send to us ("**correspondence data**"). The correspondence data

may include the communication content and metadata associated with the

communication. Our website will generate the metadata associated with

communications made using the website contact forms. The correspondence

data may be processed for the purposes of communicating with you and

record-keeping. The legal basis for this processing is our legitimate interests,

namely the proper administration of our website and business and

communications with users.

We may process any of your personal data identified in this policy where

necessary for the establishment, exercise or defence of legal claims, whether

in court proceedings or in an administrative or out-of-court procedure. The

legal basis for this processing is our legitimate interests, namely the

protection and assertion of our legal rights, your legal rights and the legal

rights of others.

We may process any of your personal data identified in this policy where

necessary for the purposes of obtaining or maintaining insurance coverage,

managing risks, or obtaining professional advice. The legal basis for this

processing is our legitimate interests, namely the proper protection of our

business against risks.

In addition to the specific purposes for which we may process your personal

data set out in this Section 3, we may also process any of your personal data

where such processing is necessary for compliance with a legal obligation to

which we are subject, or in order to protect your vital interests or the vital

interests of another natural person.

Please do not supply any other person's personal data to us, unless we

prompt you to do so.

**Providing your personal data to others**

We may disclose your personal data to our insurers and/or professional

advisers insofar as reasonably necessary for the purposes of obtaining or

maintaining insurance coverage, managing risks, obtaining professional

advice, or the establishment, exercise or defence of legal claims, whether in

court proceedings or in an administrative or out-of-court procedure.

We may disclose your enquiry data to contractors for the purpose of enabling

them to undertake their services. Each such third party will act as a data

controller in relation to the enquiry data that we supply to it.4.3 In addition to the specific disclosures of personal data set out in this Section

4, we may disclose your personal data where such disclosure is necessary for

compliance with a legal obligation to which we are subject, or in order to

protect your vital interests or the vital interests of another natural person. We

may also disclose your personal data where such disclosure is necessary for

the establishment, exercise or defence of legal claims, whether in court

proceedings or in an administrative or out-of-court procedure.

**5. Retaining and deleting personal data**

5.1 This Section 5 sets out our data retention policies and procedures, which are

designed to help ensure that we comply with our legal obligations in relation

to the retention and deletion of personal data.

5.2 Personal data that we process for any purpose or purposes shall not be kept

for longer than is necessary for that purpose or those purposes.

5.3 We will retain your personal data as follows:

(a) All of your data will be retained for a minimum period of 1 month and

for a maximum period of three years unless a contract for services goes

beyond this.

5.4 In some cases it is not possible for us to specify in advance the periods for

which your personal data will be retained.

5.5 Notwithstanding the other provisions of this Section 5, we may retain your

personal data where such retention is necessary for compliance with a legal

obligation to which we are subject, or in order to protect your vital interests

or the vital interests of another natural person.

**6. Amendments**

6.1 We may update this policy from time-to-time by publishing a new version on

our website.

6.2 You should check this page occasionally to ensure you are happy with any

changes to this policy.

6.3 We will notify you of significant changes to this policy by email.

**7. Your rights**

7.1 In this Section 7, we have summarised the rights that you have under data

protection law. Some of the rights are complex, and not all of the details have

been included in our summaries. Accordingly, you should read the relevant

laws and guidance from the regulatory authorities for a full explanation of

these rights.

7.2 Your principal rights under data protection law are:

(a) the right to access;

(b) the right to rectification;7.3 7.4 7.5 7.6 7.7 (c) the right to erasure;

(d) the right to restrict processing;

(e) the right to object to processing;

(f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

You have the right to confirm as to whether or not we process your personal

data and, where we do, access to the personal data, together with certain

additional information. That additional information includes details of the

purposes of the processing, the categories of personal data concerned and

the recipients of the personal data. Providing the rights and freedoms of

others are not affected, we will supply to you a copy of your personal data.

The first copy will be provided free of charge, but additional copies may be

subject to a reasonable fee.

You have the right to have any inaccurate personal data about you rectified

and, taking into account the purposes of the processing, to have any

incomplete personal data about you completed.

In some circumstances you have the right to the erasure of your personal

data without undue delay. Those circumstances include: the personal data is

no longer necessary in relation to the purposes for which they were collected

or otherwise processed; you withdraw consent to consent-based processing;

you object to the processing under certain rules of applicable data protection

law; the processing is for direct marketing purposes; and the personal data

have been unlawfully processed. However, there are exclusions of the right to

erasure. The general exclusions include where processing is necessary: for

exercising the right of freedom of expression and information; for compliance

with a legal obligation; or for the establishment, exercise or defence of legal

claims.

In some circumstances you have the right to restrict the processing of your

personal data. Those circumstances are: you contest the accuracy of the

personal data; processing is unlawful but you oppose erasure; we no longer

need the personal data for the purposes of our processing, but you require

personal data for the establishment, exercise or defence of legal claims; and

you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store

your personal data. However, we will only otherwise process it: with your

consent; for the establishment, exercise or defence of legal claims; for the

protection of the rights of another natural or legal person; or for reasons of

important public interest.

You have the right to object to our processing of your personal data on

grounds relating to your particular situation, but only to the extent that the

legal basis for the processing is that the processing is necessary for: the

performance of a task carried out in the public interest or in the exercise of7.8 7.9 7.10 7.11 7.12 7.13 any official authority vested in us; or the purposes of the legitimate interests

pursued by us or by a third party. If you make such an objection, we will

cease to process the personal information unless we can demonstrate

compelling legitimate grounds for the processing which override your

interests, rights and freedoms, or the processing is for the establishment,

exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct

marketing purposes (including profiling for direct marketing purposes). If you

make such an objection, we will cease to process your personal data for this

purpose.

You have the right to object to our processing of your personal data for

scientific or historical research purposes or statistical purposes on grounds

relating to your particular situation, unless the processing is necessary for the

performance of a task carried out for reasons of public interest.

To the extent that the legal basis for our processing of your personal data is:

(a) consent; or

(b) that the processing is necessary for the performance of a contract to

which you are party or in order to take steps at your request prior to

entering into a contract,

and such processing is carried out by automated means, you have the right to

receive your personal data from us in a structured, commonly used and

machine-readable format. However, this right does not apply where it would

adversely affect the rights and freedoms of others.

If you consider that our processing of your personal information infringes data

protection laws, you have a legal right to lodge a complaint with a supervisory

authority responsible for data protection. You may do so in the EU member

state of your habitual residence, your place of work or the place of the alleged

infringement.

To the extent that the legal basis for our processing of your personal

information is consent, you have the right to withdraw that consent at any

time. Withdrawal will not affect the lawfulness of processing before the

withdrawal.

You may exercise any of your rights in relation to your personal data by

written notice to us, in addition to the other methods specified in this Section

7.

**8. About cookies**

8.1 A cookie is a file containing an identifier (a string of letters and numbers) that

is sent by a web server to a web browser and is stored by the browser. The

identifier is then sent back to the server each time the browser requests a

page from the server.(b) 8.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent

cookie will be stored by a web browser and will remain valid until its set

expiry date, unless deleted by the user before the expiry date; a session

cookie, on the other hand, will expire at the end of the user session, when the

web browser is closed.

8.3 Cookies do not typically contain any information that personally identifies a

user, but personal information that we store about you may be linked to the

information stored in and obtained from cookies.

**9. Cookies that we use**

9.1 We use cookies for the following purposes:

(a) authentication - we use cookies to identify you when you visit our

website and as you navigate our website (cookies used for this purpose

are: svSession and RequestID);

status - we use cookies to help us to determine if you are logged into

our website (cookies used for this purpose are: smSession);

**10. Cookies used by our service providers**

10.1 Our service providers use cookies and those cookies may be stored on your

computer when you visit our website.

10.2 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://policies.google.com/privacy>.

**11. Managing cookies**

11.1 Most browsers allow you to refuse to accept cookies and to delete cookies.

The methods for doing so vary from browser to browser, and from version to

version. You can however obtain up-to-date information about blocking and

deleting cookies via these links:

(a) https://support.google.com/chrome/answer/95647 (Chrome);

(b)

https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-websi

te-preferences (Firefox);

(c) https://www.opera.com/help/tutorials/security/cookies/ (Opera);

(d)

https://support.microsoft.com/en-gb/help/17442/windows-internet-expl

orer-delete-manage-cookies (Internet Explorer);

(e) https://support.apple.com/kb/PH21411 (Safari); and(f)

https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-pr

ivacy (Edge).

11.2 Blocking all cookies will have a negative impact upon the usability of many

websites.

11.3 If you block cookies, you will not be able to use all the features on our

website.

**12. Our details**

12.1 This website is owned and operated by The Cwmbran Centre for Young People.

12.3 You can contact us:

(a) using our website contact form;

(b) by email, using the email address published on our website.