



WILDFIRE'S PRIVACY POLICY – for parents, guardians and young people

Introduction

Welcome to Wildfire's privacy policy.

Wildfire respects your privacy and is committed to protecting your **personal data**. This privacy policy will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Words that we use in **bold** are either explained below or in the Explanation Section (in section 10 below).

This privacy policy contains the following sections:

1. IMPORTANT INFORMATION AND WHO WE ARE

2. THE DATA WE COLLECT ABOUT YOU

3. HOW IS YOUR PERSONAL DATA COLLECTED?

4. HOW WE USE YOUR PERSONAL DATA

5. DISCLOSURES OF YOUR PERSONAL DATA

6. INTERNATIONAL TRANSFERS

7. DATA SECURITY

8. DATA RETENTION

9. YOUR LEGAL RIGHTS

10. EXPLANATION SECTION

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how Wildfire collects and uses (**processes**) your **personal data**. This happens when you:

- (a) contact us;
- (b) sign up for our newsletter;
- (c) sign up for or attend one of our events or activities.

It is important that you read this privacy policy together with any other privacy related information we may provide at other times when we are collecting or processing personal data about you, so that you are fully



aware of how and why we are using your personal data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

References in this privacy policy to “Wildfire” means Wildfire Youth Project (Charity Number 1202682) which is the controller and responsible for your personal data (collectively referred to as, "we", "us" or "our" in this privacy policy).

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact our data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our what we do with your (or your child’s) personal data, please contact our data privacy manager in the following ways:

Full name of legal entity: Wildfire Youth Project

Email address: hello@wildfireyouthproject.com

Postal address: St Mary’s Church, London Rd, Kings Worthy, Winchester, SO23 7QL

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was issued in November 2023.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, username or similar identifier, title, date of birth, gender and image.



- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of services you have received from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Sensitive Data** includes details about your health (including any illnesses or conditions or medications we need to know about to support you when providing our Services, if required) and religious or philosophical beliefs. We do not collect any information about criminal convictions and offences.
- **Usage Data** includes information about how you use our website
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

If you fail to provide personal data

Where we need to collect personal data by law, or in order to be able to provide our services to you, and you fail to provide that data when requested, we may not be able to provide those services. In this case, we may have to cancel the offer of the service(s), but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes when you:
 - Register for our **Services** ;
 - Receive information;
 - Attend a Wildfire activity;
 - Subscribe to a Wildfire newsletter; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies.



4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide any requested Services to you (known as performing a contract e.g. Services requested by you as a parent for your child or (in the case of a child over 13 years old) Services requested by that child
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Refer to the Explanation Section in Section 10 below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will rely on parental consent where we are providing our Services to children under 13 years of age and in any other circumstances where the law requires this in order to process a child's personal data. We will also obtain consent before sending any direct marketing communications to you via electronic means. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below, a description of all the ways we collect and plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

We may collect personal data in each of these ways and for each of these purposes:

- (a) Identity Data and Contact Data may be collected from you (or if you are a child from your parent) to register you to receive our Services or information about our Services (such as to receive newsletters or to attend an activity). This may be collected via our website, by email, in person or over the telephone.

Sensitive Data may be collected from you (or if you are a child from your parent) only so far as required to enable us to support you when providing the Services you have requested e.g. to keep health information when ensuring any required medications are stored or administered, or to make any adjustments in the provision of the Services as appropriate. This may be collected via our website, by email, in person or over the telephone. Sensitive Data is a category of personal data known as 'Special Category' personal data which we will only collect or use in very limited circumstances where either we have your clear approval (or if you are a child under 13, your parent or guardian's approval) or when it is absolutely necessary to use it for a lawful reason.



We will only process (use) your personal data in a lawful way, relying on the following lawful bases:

- (a) Where you have (or if you are a child under 13 your parent or guardian has) we can collect this personal data (consent)
- (b) Where you (or if you are a child your parent or guardian) have agreed with us that we are to provide you with any of our Services (performance of a contract)
- (c) Where we need to protect you from the risk of physical harm (such as injury or death) e.g. arrange emergency treatment (vital interest)
- (d) Where it is in our lawful interest to process (use) your personal data for the purposes of developing, expanding or improving our services and or those of any of the organisations we may work with e.g. a school or church partner (legitimate interest).

Marketing

Promotional offers from us

We may use your Identity and Contact, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from, received services from us or given us your consent to send these to you (and you have not opted out of receiving that marketing).

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following any opt-out links on any marketing message sent to you **OR** by contacting us at any time.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish



to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the parties set out below for the purposes set out above.

- External Third Parties as set out in the *Explanation Section*.
- Third parties to whom we may choose to transfer or merge parts of our organisation or our assets. Alternatively, we may seek to acquire other businesses or merge with them.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the UK unless there are adequate, lawful safeguards in place to do so.

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to



know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us

In some circumstances you can ask us to delete your data: see *your legal rights* below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*



If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Explanation Section

Controller means anyone who has overall control over the person data and when, how or why the it is processed (used).

Personal Data means personal information about you or someone else which can identify you or them in some way. For example, it can include your name, date of birth, address, medical information or your religion. **It does not include data where the identity has been removed (anonymous data).**

Processing or to **Process** in relation to Personal Data means using it in any way, such as collecting it, entering it onto a computer systems, storing it in our filing systems or sharing it.

Services means events or other activities run by Wildfire or with any of our partners (such as schools or churches).

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our organisation to enable us to give you the best services and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by



law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based [in the EEA or US] who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
- Other official bodies, such as schools or colleges we may need to work with to provide the services and/or to support or to protect any service user's welfare.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may



demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.