

URDD PRIVACY NOTICE

OUR APPROACH TO PRIVACY

The Urdd is both a registered charity and a company registered in England and Wales. We take your privacy extremely seriously and want you to feel confident that your personal information is safe in our hands.

In this document (our “privacy notice”), we explain how we use your personal information and our reasons for doing so. We also explain what our obligations are under data protection law and how we protect your personal information. In addition, we provide you with information about the rights you have and how you can contact us.

We may also provide you with additional privacy information from time to time. Any such additional privacy information should be read alongside this privacy notice.

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WHO DOES THIS PRIVACY NOTICE APPLY TO?

This privacy notice applies to anyone who:

- attends an Urdd organised trip, attends one of our centres, whether on a residential basis or otherwise, or participates in an Urdd activity/club whether at one of our centres or otherwise;
- applies to become a member of the Urdd, whether online, over the telephone or through a school or local branch;
- takes part in an Urdd event/production or competition (including Urdd Eisteddfod, Gemau Cymru and other sporting events);
- uses our website or apps;
- purchases goods from us, online or over the telephone;
- contacts us with a query or to make a complaint (whether in person, by email, telephone or post);
- subscribes to our newsletters/updates;
- agrees to complete one of our surveys or questionnaires or to provide us with feedback;

- is filmed on our CCTV systems;
- engages with us on social media.

A SUMMARY OF THE LAW

All businesses and organisations in the UK are subject to data protection laws which regulate their use of information that identifies or enables the identification of individuals (“personal information”).

Below, we summarise the main rules that apply:

1.	We must be upfront about how we intend to use your personal information and must use your personal information fairly. Providing a privacy information to individuals (such as this privacy notice) helps us to fulfil this obligation.
2.	We must only use your personal information if one of the legal grounds set out in data protection law apply. These legal grounds include that: <ul style="list-style-type: none">• You have consented to our use of your personal information;• We need to use your personal information to fulfil a contract between us;• We (or someone else) has a legitimate reason for needing to use your personal information and it would not be unfair to you if your personal information was used for this purpose. This is known as having a “legitimate interest” and we must weigh up your rights and our interests before we can rely upon this ground;• We need to use your personal information to comply with the law;• We need to use the information to protect your vital interests or the vital interests of another person, this will only apply in very serious situations such as where we need to use your information in a life or death situation.
3.	We must only use certain types of sensitive personal information (such as information relating to your medical history, racial origin or religion) if we can satisfy one of the conditions for use set out in data protection law. These conditions include that: <ul style="list-style-type: none">• You have given us your explicit consent to use the information;• We need to use the information to protect your vital interests or the vital interests of another person, in the same way described above;• We need to use the information in connection with a legal claim.
4.	We must only share your personal information with other businesses if we have a legal ground for doing so (see point 2 above) and/or (in relation to sensitive personal information) we can satisfy a condition (see point 3 above).
5.	Generally speaking, we must only use your personal information for the purposes we have told you about. If we want to use your personal information for a different purpose, we need to contact you again to tell you about this.
6.	We must not hold more personal information than we need for the purposes we have told you about and must not retain your personal information for longer than is necessary for that purpose (this is known as a the “ retention period ”). We must also dispose of any information that we no longer need securely.

7.	We must ensure that we have appropriate security measures in place to protect your personal information.
8.	We must act in accordance with your rights under data protection law (more information about your rights under data protection law can be found here)
9.	We must not transfer your personal information outside the European Economic Area (“EEA”) unless we certain safeguards are put in place. These include that the personal data is only transferred to countries outside the EEA that have been approved by the European Commission.

HOW WILL WE USE YOUR PERSONAL INFORMATION?

In this section we provide you with further information about each of the different situations in which we will use your personal information, what we will use it for and how we comply with our main obligations under data protection law.

Attending an Urdd organised trip, attends one of our centres, whether on a residential basis or otherwise, or participates in an Urdd activity/club whether at one of our centres or otherwise

<p>When you sign up yourself or your child/group for one of our trips or to one of our activities/clubs or to attend one of our centres, you will be required to provide the following personal information to us in relation to the relevant individuals:</p>	<ul style="list-style-type: none"> • name, address and contact details including email address; • date of birth; • gender; • family details, emergency contact details and next of kin; • Bank account details or credit card details of the person paying; • Any relevant medical details, which will fall into the category of special category personal information; • Passport details if the trip requires travel abroad.
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • To fulfil our contract (i.e. to supply the services and to collect payment). Without this information we will be unable to provide the relevant services.
<p>Our use of the personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • The information is necessary for the performance of a contract.
<p>We require the special category personal information namely medical information for the following reasons:</p>	<ul style="list-style-type: none"> • To assess suitability of the participant(s) to take part in the trip/activity in question; • To adapt/adjust the trip/activity appropriately where this may be required; • To accommodate/be aware of any allergies the participant(s) may have; • To ensure the health and safety of all participants/attendees. • In addition, we will only share the special category personal information with any individuals involved in the provision of the trip/activity and with medical professionals, first aiders and catering staff, as necessary for any of the above purposes.
<p>Our use of the medical information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • Express consent to use the information. • Express consent to share the information.

<p>We will retain the information for the following period(s):</p>	<ul style="list-style-type: none"> • Bank or credit card details will only be used to process payment and will not be stored by us. • Contact details will be kept for the duration of the trip/activity and thereafter retained for marketing purposes, provided consent has been given. • Medical information and date of birth of the participant(s) will be kept for the duration of the trip/activity and for a period of up to 3 months thereafter. However, in the event of an accident or incident the personal information, including the medical/health information and any additional relevant information recorded in relation to the accident/incident will be held for 3 years after the participant/attendee in question reaches their 18th birthday.
<p>Our reason(s) for retaining the information for the period(s) specified above:</p>	<ul style="list-style-type: none"> • We need to keep the personal information for this period in order to be able to defend any potential claim which might be brought in relation to the accident/incident.
<p>Can you refuse to provide the personal information to us and if so what will the consequences be?</p>	<ul style="list-style-type: none"> • Yes you can, but if you do so we will be unable to provide the services. • If you do not provide any medical information, we will assume that there are none which we need to be made aware of.

Applying to become a member of the Urdd, whether online, over the telephone or through a school or local branch;

<p>When you apply to become a member of the Urdd either for yourself or on behalf of a child you will be required to provide the following personal information to us in relation to the relevant individuals:</p>	<ul style="list-style-type: none"> • Name, address and contact details including e-mail address; • Date of birth, school year; • Gender; • Name of the school or branch affiliated to; • Family details; • Whether a first language Welsh speaker or a learner; • Bank account details or credit card details of the person paying; • Gift aid information of the person paying.
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • We will use the personal information you provide to us to fulfil our contract (i.e. for member enrolment and to collect payment) and for general member administration purposes. • We will also use the personal information provided (other than payment and gift aid information) if participating in one of our events or competitions e.g. Urdd sporting events or the Urdd Eisteddfod.
<p>Our use of the personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • The information is necessary for the performance of a contract. • In relation to participation in events and competitions, our use of the personal information will be legitimate interests. Namely, to facilitate participation in such events/competitions.
<p>We will retain the information for the following period(s):</p>	<ul style="list-style-type: none"> • Bank or credit card details will only be used to process payment and will not be stored by us. • The remainder of your personal information will be retained for the duration of the membership and for a period of 36 months after any lapse in membership.
<p>Our reason(s) for retaining the information for the period(s) specified above:</p>	<ul style="list-style-type: none"> • We need to keep the name, contact details and other general information for the period of membership in order to be able to administer the membership and fulfil our contract. • We retain details of your membership for 36 months after any lapse in membership in order to facilitate the re-joining process. • Personal information will be retained for marketing purposes provided consent has been given, unless and until consent is withdrawn.

Can you refuse to provide the personal information to us and if so what will the consequences be?	<ul style="list-style-type: none">• Yes you can, but if you do so we will be unable to enrol the member.
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Taking part in an Urdd event/production or competition (including Urdd Eisteddfod, Gemau Cymru and other sporting events)

<p>When you register to take part in an Urdd event/production or competition either for yourself or on behalf of a child you, your school or aelwyd or your sport's governing body (in the case of Gemau Cymru participation) will be required to provide the following personal information to us in relation to the relevant individuals:</p>	<ul style="list-style-type: none"> • Name, address and contact details; • Date of birth, school year; • Gender; • Name of the school or branch affiliated to; • Family details; • Whether a first language Welsh speaker or a learner; • Any relevant medical details, which will fall into the category of special category personal information; • Bank account details or credit card details of the person paying; • Gift aid information of the person paying.
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • We will use the personal information you provide to us to register the competitor for the event/competition and for general event/competition administration purposes • We will record the name and school/branch details of any competitors placed 1st to 3rd and other key participants and publish this information in printed form and on our website, apps and social media platforms to promote the competition/event/production.
<p>Our use of the personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • Where the competition is governed by rules and terms such as the Eisteddfod, use of the personal information will be that it is necessary for the performance of a contract. • In all other circumstances our legal basis for using the personal information will be legitimate interests. Namely, to facilitate participation in such events/competitions and to promote the events and competitions and successful participants.
<p>We require the special category personal information namely medical information for the following reasons:</p>	<ul style="list-style-type: none"> • To assess suitability to take part in the event/competition in question; • To adapt/adjust the event/competition appropriately where this may be required; • To accommodate/be aware of any allergies; • To ensure the health and safety of all competitors/attendees. • In addition, we will only share the special category personal information with any individuals involved in the provision of the competition/event and with medical professionals, first aiders and catering staff, as necessary for any of the above purposes.

<p>Our use of the medical information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • Express consent to use the information. • Express consent to share the information.
<p>We will retain the information for the following period(s):</p>	<ul style="list-style-type: none"> • Bank or credit card details and gift aid information will only be used to process payment and will not be stored by us. • The remainder of the personal information will be retained for the duration of the event/competition and for a period of 36 months thereafter. We need to keep the name, contact details and other general information for the period of the event/competition in order to be able to administer participation and for follow up purposes after the event/competition. • However, in the event of an accident or incident the personal information, including the medical/health information and any additional relevant information recorded in relation to the accident/incident will be held for 3 years after the participant/attendee in question reaches their 18th birthday. We need to keep your personal information for this period in order to be able to defend any potential claim which might be brought in relation to the accident/incident. • Names and details of school and/or branch of competitors placed 1st to 3rd in any Urdd competition and other key participants will be held indefinitely for reference purposes and historical interest.
<p>Can you refuse to provide the personal information to us and if so what will the consequences be?</p>	<ul style="list-style-type: none"> • Yes you can, but if you do so you we may be unable to register participants for the event/competition.

USE OF PHOTOGRAPHS AND FILMING EVENTS

Where photographs and film identify individuals, these will be dealt with in accordance with our obligations under the GDPR.

Photographs and film taken while competing or performing at any Urdd event or competition may be used by the Urdd on its website, YouTube channel, social media platforms, such as iPlayer as well as being broadcasted on television and the radio. This is made clear in the Urdd's Competition rules, which are available on our website and can be found [here](#). Before registering to take part in the Eisteddfod individuals are required to confirm that they conform with all competition rules, terms and conditions, general code of conduct including broadcast rights in the National Eisteddfod. In the Eisteddfod context our legal basis for processing the personal data in photographs and film will be that this is necessary for the performance of a contract.

In all other events and competitions, we will rely on consent for processing.

Using our Website

<p>Whenever you use our website, we will automatically collect the following information from you:</p>	<ul style="list-style-type: none"> • Technical information, including the internet protocol address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; • Information about your visit, including the full Uniform Resource Locators (“URL”), clickstream to, through and from our website (including date and time), products you viewed or searched for, page response times, download errors, length of visit to certain pages, page interaction information (such as scrolling clicks and mouse-overs), methods used to browse away from the page.
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • The information referred to above is used by us to make a tailored website available to you and to help us to continually improve our website.
<p>Our use of your personal information will be based on the following ground(s):</p>	<p>Our legitimate interest in ensuring that our website is user friendly and easy to use.</p>
<p>We will retain your information for the following period(s):</p>	<ul style="list-style-type: none"> • 26 months from your last visit
<p>Our reason(s) for retaining your information for the period(s) specified above:</p>	<ul style="list-style-type: none"> • to track the use and navigation of our website and to allow us to recognise trends over a reasonable period in order to help us to make continual improvements to our website.
<p>Our use of Cookies</p>	<ul style="list-style-type: none"> • Our website also uses cookies. • Our Cookies Policy will be available shortly on our website.
<p>Can you refuse to provide your personal information to us and if so what will the consequences be?</p>	<ul style="list-style-type: none"> • If you disable our Cookies, you will be unable to use certain parts of/functions on our website. Further information about this can be found in our Cookies Policy which will be available shortly on our website.

Purchasing goods from us, online or over the telephone

<p>When making your purchase online, you will be required to provide the following personal information to us:</p>	<ul style="list-style-type: none"> • Your full name; • Your address; • Your e-mail address; • Your telephone number; and • Bank or credit card details.
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • Your name and contact details are required to enable us to deliver the products you have purchased; • Your bank or credit card details are required to enable us to take payment and where PayPal is used as a means of payment such information is shared with PayPal to process the payment. • Marketing and/or market research
<p>Our use of your personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • The information is necessary for the performance of a contract between us. • We will only use your personal information for marketing or market research purposes where you have consented to this.
<p>We will retain your information for the following period(s):</p>	<ul style="list-style-type: none"> • Your name and contact details and details of your purchase will be retained for 12 months in case of any dispute in relation to the goods; • Where you have consented to receive direct marketing information from us we will retain your contact details for these purposes unless and until you tell us you no longer wish us to contact you for these purposes; • Your bank or credit card details will only be used to process payment and will not be stored by us.
<p>Our reason(s) for retaining your information for the period(s) specified above:</p>	<ul style="list-style-type: none"> • We need to keep your name and contact details for the period referred to above in case you have a problem with your purchase.
<p>Can you refuse to provide your personal information to us and if so what will the consequences be?</p>	<ul style="list-style-type: none"> • Yes you can, but if you do so you we may be unable to supply to you.

Contacting us with a query or to make a complaint (whether in person, by email, telephone, or post)

<p>When making your query or complaint you will be asked to provide the following personal information to us:</p>	<ul style="list-style-type: none"> • Your full name; • Your address; • Your email address; • Your telephone number; and • Any information relevant to your query/complaint
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • To deal with your query or complaint (as applicable). • We will also re-use the information for internal development and training purposes.
<p>Our use of your personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • Our legitimate interest in assisting you with your query/resolving your complaint. • Our legitimate interest in improving our business and training our staff. • If your query/complaint involves providing us with any special category personal information, we will only process that information with your express consent.
<p>We will retain your information for the following period(s):</p>	<ul style="list-style-type: none"> • A record of your query/complaint will be retained until resolved and for a period of 12 months thereafter.
<p>Our reason(s) for retaining your information for the period(s) specified above:</p>	<ul style="list-style-type: none"> • For staff development and training purposes and in order to be able to defend any legal claims/disputes.

Individuals who subscribe to magazines/newsletters/updates

<p>If you sign up to receive magazines/newsletters/updates from us we will ask you to provide the following information:</p>	<ul style="list-style-type: none"> • Your name and address; • Child's name • School • Your email address; • If relevant - The organisation you work for and your position in it; and • Your preferences as to how you want us to deliver magazines/newsletters/updates to you. • Your bank/payment details in relation to magazine subscriptions
<p>We require this information for the following reasons:</p>	<ul style="list-style-type: none"> • To provide you with the magazines/newsletters/updates you have requested; • Your bank or credit card details are required to enable us to take payment and where PayPal is used as a means of payment such information is shared with PayPal to process the payment.; • To provide you with related materials that we think may be of interest to you.
<p>Our use of your personal information will be based on the following ground(s):</p>	<ul style="list-style-type: none"> • We will rely on your consent to provide you with magazines/newsletters/updates you have requested; • We will rely on our legitimate interest in promoting our products and services to provide you with related materials.
<p>We will retain your information for the following period(s):</p>	<ul style="list-style-type: none"> • Until you inform us otherwise.
<p>Our reason(s) for retaining your information for the period(s) specified above:</p>	<ul style="list-style-type: none"> • To provide you with the information requested for the period.
<p>Can you refuse to provide your personal information to us and if so what will the consequences be?</p>	<p>If you refuse to provide the personal information we will be unable to provide you with the newsletters/updates requested.</p>

Completion of one of our surveys or questionnaires or to provide us with feedback

Our feedback questionnaires or surveys are normally anonymous. However, you have the option to provide personal information. In such circumstances the personal information we will use will be:	<ul style="list-style-type: none">• Your full name;• Your contact details; and• Any information provided by you when completing the questionnaire/survey
We require this information for the following reasons:	<ul style="list-style-type: none">• To obtain feedback and comments to improve our services.• We will also use the information for internal development and training purposes.
Our use of your personal information will be based on the following ground(s):	<ul style="list-style-type: none">• Our legitimate interest in ensuring that we improve our business and our services.• Our legitimate interest in training our staff.
We will retain your information for the following period(s):	<ul style="list-style-type: none">• A record of your feedback/questionnaire response will be retained for a period of 12 months.
Our reason(s) for retaining your information for the period(s) specified above:	<ul style="list-style-type: none">• To improve our service and for staff development and training purposes.

CCTV

What personal information we will use	Your image captured on the CCTV cameras
What purposes we will use the personal information for	<ul style="list-style-type: none">• to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;• for the personal safety of staff, visitors and other members of the public, and to act as a deterrent against crime;• assisting in the maintenance of public order;• to support law enforcement bodies in the prevention, detection, investigation and prosecution of crime;• to provide assistance with civil claims;• to assist in day-to-day management, including ensuring the health and safety of staff and others.
The legal basis for processing we rely upon	<ul style="list-style-type: none">• we will rely on our legitimate interest in protecting our buildings, assets, staff and visitors and preventing crime.• To the extent that the CCTV images include special category personal data we will rely on the substantial public interest in preventing and detecting unlawful acts
How long we retain the personal information and why	<ul style="list-style-type: none">• Data recorded by the CCTV system will be digitally recorded and stored securely on hard drives. CCTV images will be deleted after 30 days.• Where an incident has occurred or where footage has been requested by the police, prosecution agencies, legal representatives or people whose images have been recorded and retained the usual retention period may be overridden and the footage will be retained until the matter is resolved.
Who we share the personal information with	<ul style="list-style-type: none">• the police;• prosecution agencies;• relevant legal representatives;• people whose images have been recorded and retained.• Only when our Data Privacy Manager deems it appropriate to do so having considered all relevant circumstances• The WMC who provide and monitor the CCTV system at our Cardiff site.

Engages with us on social media

Any social media posts or comments you send to us (on the Urdd Facebook page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written and could be made public. Other people, not us, control these platforms. We are not responsible for this kind of sharing. So, before you make any remarks or observations about anything, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you'll understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you're unhappy about it.

WHEN WILL WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

The term “direct marketing” essentially means directing any marketing material or advertising particularly at you. We would like to be able to send you direct marketing from time to time so that we can tell you about our latest offers and products and services which we think may be of interest to you. However, in the UK, use of personal information by businesses and organisations for this purpose is subject to specific direct marketing rules as well as data protection law).

Consequently, we will only use your personal information for direct marketing in the circumstances outlined below:

Direct marketing by telephone or email, text or other forms of electronic communication	<ul style="list-style-type: none">• If you have given us your express consent to do so.
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You can ask us to stop direct marketing you at any time by visiting our website or contacting data@urdd.org. Also, every time we contact you electronically or by post, we will give you the option to opt out of further direct marketing.

WHEN WILL WE USE SHARE YOUR PERSONAL INFORMATION WITH OTHERS?

Sometimes, we will need to share your personal information with third parties. This section sets out details of who we will share your personal data with and why and how we will meet our obligations under data protection law.

We will not sell your personal information on to third parties for marketing purposes.

Service partners

<p>Who are our service partners?</p>	<ul style="list-style-type: none"> • Suppliers and sub-contractors used by us in connection with the supply and delivery of goods and services to our customers, such as Sage, PayPal; • Suppliers and sub-contractors used by us in connection with Urdd events and competitions, such as S4C, Avanti, Lluniau Llwyfan, Tystysgrifau, Kinetic Pixel and Teithiau Tango. • Marketing agencies used by us to create and/or deliver advertising and other promotional material on our behalf, such as MailChimp and Survey Monkey; • Organisations used by us to help improve our organisation and our events, such as Arad Research; • Businesses used by us in connection with the supply, maintenance and/or improvement of our IT network from time to time, such as BCCIT, Method 4; • Analytics and search engine providers that assist us in the improvement of our website and apps such as Lime Green Tangerine; • Sport Wales where you have participated in Gemau Cymru or similar national event organised in partnership with Sport Wales and/or the Welsh Government. <p>We haven't listed the names of all our service partners in this privacy notice because we will deal with different providers from time to time. However, if you would like more information about any of our current service providers, you can obtain this by contacting Hywel Williams: hywelwilliams@urdd.org</p>
<p>When and why do we need to share your personal information with them?</p>	<p>In order to run our organisation efficiently and effectively</p>
<p>The legal ground and/or condition we rely upon when doing so</p>	<p>Our legitimate interests in running our organisations efficiently and effectively</p>
<p>What precautions do we take?</p>	<p>We will only share your personal information with service partners who have satisfied us that they have</p>

	appropriate data protection and security measures in place to protect your personal information. We also enter into contracts with such service partners which impose on them contractual obligations relating to data protection and security, including an obligation only to use your personal information for specified purposes and in accordance with our instructions.
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Schools, Aelwyds, Adrans and Clubs

Why we need to share your personal information with Schools, Aelwyds, Adrans and Clubs	In order to check and confirm membership details.
The legal ground and/or condition we rely upon when doing so	Is legitimate interests. It is in the interests of the Urdd, the schools, aelwyds, adrans and clubs and the members that we ensure that we have an accurate list of members so that the members have access to Urdd events and activities.
What precautions do we take?	Schools, Aelwyds, Adrans and Clubs are required to take appropriate security measures to protect your personal information in line with our policies.

OTHER THIRD PARTIES

We may also need to share your personal information with others in the following circumstances:

Legal or regulatory requirements	On occasion, we may be required to disclose your personal information to organisations such as the courts or the police to comply with legal obligations we are subject to and/or to prevent fraud or crime.
Protecting our organisation	From time to time we may need to disclose your personal information in connection with steps we need to take to protect our organisation's interests or property.
Professional advice and legal action	We may need to disclose your personal information to our professional advisers (for example, our lawyers and accountants) in connection with the provision by them of professional advice and/or the establishment or defence of legal claims.

CIRCUMSTANCES IN WHICH WE WILL SEND YOUR PERSONAL INFORMATION OUTSIDE THE EEA

We do not envisage that we will need to send your personal data outside the EEA.

If we do transfer your personal data outside the EEA, we will use one of these safeguards to make sure it is protected:

- We will only transfer it to a non-EEA country which the European Commission has decided has an adequate level of protection for personal data. You can find more about such countries here https://ec.europa.eu/info/law/law-topic/data-protection_en; or
- We will put a written contract in place between us and the recipient that incorporates EC model clauses relating to the transfer of personal data outside the EEA. You can find out more about such clauses here [ICO/international transfers](#); or
- We will ask for your explicit consent.

HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

We take the following steps to protect your personal information while it is in our possession:

- Implementation of appropriate security measures to protect our IT infrastructure;
- Encryption of personal data;
- Implementation of internal data security policies and training for members of staff in relation to such policies;
- Regular reviews of data security measures implemented by service providers who may handle your personal data.

WHAT RIGHTS DO YOU HAVE UNDER DATA PROTECTION LAW?

Under data protection law, you have a number of different rights relating to our use of your personal information. The law relating to when these rights apply, the exceptions to your rights and our compliance obligations are complicated. As a result, we have only set out below a summary of your rights and our obligations. More information about your rights and our obligations can be found on the ICO website <https://ico.org.uk/>.

Description	Your rights	Our obligations
A right of access	<p>This is a right to obtain:</p> <ul style="list-style-type: none"> • confirmation of whether we are processing your personal information; • a copy of or access to any personal information we process about you; and • certain other information (specified by data protection law) about the processing we undertake. 	<p>Generally, we must provide you with a copy of your personal data free of charge. However, we can charge a reasonable fee in certain situations, including where you request additional copies of your personal information.</p>
A right to have personal data rectified	<p>This is a right to have your personal information rectified if it is inaccurate or incomplete.</p>	<p>If this right applies and we have disclosed your personal information to other organisations or businesses, we must inform them, where possible, that your personal information requires rectification. If appropriate, we must also tell you about the organisations or businesses to whom we have disclosed your personal information.</p>
A right to be forgotten	<p>This is a right to have your personal information erased. This right applies only in specific circumstances, such as where:</p> <ul style="list-style-type: none"> • We no longer need the personal information for the purposes in relation to which it was collected or obtained; or • Our legal ground for processing your personal information is that you have given us your consent to do so and you withdraw that consent. <p>Further information about the circumstances in which this right</p>	<p>If this right applies, we must:</p> <ul style="list-style-type: none"> • delete the personal information in question; and • if we have disclosed the personal information in question to other organisations or businesses, where possible, inform them about the erasure of the personal information.

	applies and also the situations in which we can refuse to erase your personal information can be found on the ICO website.	
A right to data portability	In certain circumstances, you may have the right to require that we provide you with an electronic copy of your personal information either for your own use or so that you can share it with a service provider.	Where this right applies, you can ask us, where feasible, to transmit your personal data directly to the service provider.
A right to object	This right applies in particular circumstances, including where: <ul style="list-style-type: none"> the basis for our processing of your personal data is that we have a legitimate interest to do so, but you are prejudiced or adversely affected by our use of your personal data; we are using your personal information for the purposes of direct marketing. 	Where this right applies, you will have the right to require us to stop processing your personal information. You may also have the right to require us to erase the personal information in question
A right to restrict processing	This is a right to 'block' or suppress processing of your personal information.	<p>If we are required to restrict our processing of your personal information we will be able to store it but not otherwise use it. We may only retain enough information about you to ensure that the restriction is respected in future. This right will apply in a number of different circumstances including where you contest the accuracy or completeness of your personal information (in which case we will be required to restrict our use of your personal information until we have verified the accuracy of your personal information).</p> <p>If we have disclosed the personal information in question to third parties, we will be required to inform them, where feasible, about the restriction on the processing of your personal information.</p> <p>If we decide to lift a restriction on the use of your personal information, we must inform you of this fact.</p>

General points to note relating to your rights

- You can make a request to us to exercise any of the rights described above in a variety of ways including:
- By phone 01239 652165, post Swyddog Gweinyddol DATA / *DATA Administration Officer*, Swyddfa Penhelyg, Gwersyll yr Urdd, Llangrannog, Llandysul, Ceredigion, SA44 6AE, or email data@urdd.org.

You do not have to use a particular form to make your request.

- If you exercise any of the rights listed above, under data protection law we are required to respond within certain timescales. You can find out more about this on the ICO's website.
- In certain circumstances, we may have the right to refuse to comply with your request. Again, you can find out more about this on the ICO's website. If we believe we are not required to comply with a request you have made, we will contact you within one month of receipt of your request to explain why we think this is the case and to tell you about your rights to lodge a complaint and take legal action.
- Generally, we cannot charge you for dealing with a request to exercise any of your rights. However, if you make excessive or manifestly unfounded requests, we have the right under data protection law to charge a reasonable fee to enable us to recover our administrative costs or to refuse to act on your request.
- When making a request, we are entitled to ask you to provide us with any information that may be necessary to confirm your identity.

YOUR RIGHT TO WITHDRAW CONSENT

Where our use of your personal information is based on your consent you have the right to withdraw your consent at any time. To withdraw your consent, please contact data@urdd.org. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we are able to base our processing on a different legal ground.

HOW TO CONTACT US

You can contact us in the following ways:

We have appointed a data privacy manager to oversee our compliance with data protection law and this privacy notice.

If you have any questions about this privacy notice or how we handle your personal information, please contact our privacy manager. You can find the relevant contact details here:

Hywel Williams

hywelwilliams@urdd.org

YOUR RIGHT TO COMPLAIN TO THE INFORMATION COMMISSIONER'S OFFICE

You have the right to make a complaint at any time to the UK's supervisory authority for data protection issues, the Information Commissioner's Office.

CHANGES TO OUR PRIVACY NOTICE

We may update this privacy notice from time to time. If we make any substantial updates, we will provide you with a new privacy notice. We may also notify you in other ways from time to time about the processing of your personal information.