

Privacy Notice

Last updated: January 2021

This Data Privacy Policy (the “**Privacy Notice**”) describes the categories of personal data the 25th Purley (St. Mark’s) Scout Group (“we”, “us”, or “our”) processes and for what purposes. We respect your right to privacy. This Privacy Notice explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. We are committed to collecting and using such data fairly and in accordance with the requirements of the United Kingdom General Data Protection Regulation and the Data Protection Act 2018 as amended. This Privacy Notice applies to personal information that we collect through our website at <https://www.25thpurley.org.uk>, through our my25th database provided by iPAL (the “**Website**”) and personal information that we collect when you use or interact with our services, either physically or electronically. This Privacy Notice applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors, and members of the general public who interact with the 25th Purley (St. Mark’s) Scout Group.

If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Privacy Notice.

We recommend that you read this Privacy Notice in full to ensure you are fully informed.

What does the 25th Purley (St. Mark’s) Scout Group do?

The 25th Purley (St. Mark’s) Scout Group is a volunteer Scout Group operating under the Croydon District Scout Council (Registered Charity No. 282738) and The Scout Association (Registered Charity No. 306101). We provide Scouting opportunities to young people aged between 6 and 14.5 years.

For more information about us, please see the “About” section of our Website at <https://www.25thpurley.org.uk/about-us>.

What personal information does the 25th Purley (St. Mark’s) Scout Group collect and why?

The personal information that we may collect about you broadly falls into the following categories:

Information that you provide voluntarily

We may ask you (either directly or through certain parts of the Website) to provide personal information voluntarily: for example, we may ask you to provide your contact details in order to register an account with us, to subscribe to marketing communications from us, and/or to submit enquiries to us. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

Where a member is under the age of 18, this information will be obtained only from a parent or guardian and cannot be provided directly by a young person. We may collect the following personal information:

- Personal contact details such as name, title, address, telephone number, email address so we can contact you;
- Date of birth so we can ensure our young people are allocated to the appropriate Section for their age;
- Gender so we are able to address individuals correctly and accommodate for their needs;
- Emergency contact information so we are able to contact someone in the event of an emergency;
- Bank account details so that we are able to collect gift aid from HMRC where donations are made.

Some of the personal information that you provide may include special categories of personal data of a sensitive nature, such as health-related information or information about your race or ethnicity, which we need on a legitimate interest basis to ensure that we can make suitable arrangements based on cultural needs, medical needs, so that the leader team are well informed and prepared to deal with medical scenarios if and when they occur. We may also collect Government identification details such as national insurance number, driving licence and passport number to be able to process volunteer criminal record checks. You hereby explicitly consent to us processing these special categories of data for our Scouting purposes only and shall not otherwise process, transfer, submit or utilise the data for any other reason.

Information that we collect automatically

When you visit our Website, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location) and other technical information. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors.

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading “Cookies and similar tracking technology” below.

Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including relevant disclosure statements from the Disclosure and Barring Service), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The types of information we collect from third parties include criminal record checks and we use the information we receive from these third parties to ensure we are able to provide the right volunteer support to our sections.

In general, we will use the personal information we collect from you only for the purposes described in this Privacy Notice or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

Who does the 25th Purley (St. Mark's) Scout Group share my personal information with?

- We may disclose your personal information to the following categories of recipients:
 - Adult volunteers: We may share personal information with adult volunteers holding appropriate positions within the Scout Group to be able to provide our Scouting service to you
 - The Scout Association: We may need to share personal information with the Scout Association as our umbrella organisation, who provide services to us and who may process such personal information for reasons such as insurance requirements and its legal obligations. We may also need to share personal information with Croydon District and Greater London South West County, their volunteers and support team for the purposes itemised herein.
 - iPAL for the provision of the my25th Database
 - Third Parties: We will only share your data with third parties outside of the organisation where there is a legitimate reason to do so, and we will never sell your personal information to any third party. Sometimes, we may nominate a member for various awards and such nominations may require us to share personal information about the applicant with them. You consent to us providing such information.
- When disclosing personal information to third parties itemised above, we shall use reasonable endeavours to ensure that those third parties process your data in accordance with applicable data protection regulations in force from time to time; and shall submit such information to third parties solely to the extent necessary for the purposes of the legitimate interests pursued by us or by such third party.

Legal basis for processing personal information

- Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it. In most cases, the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members.
 - We comply with our obligations under the GDPR and the DPA 2019. However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.
 - If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).
 - Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.
 - We use the personal data for *inter alia* the following purposes:
 - To provide information about Scouting meetings, activities, training courses and camps to our members and other volunteers;
 - To provide a voluntary service for the benefit of the public;

- To administer membership records;
 - To fundraise and promote the interests of Scouting;
 - To manage our volunteers;
 - To maintain our own accounts and records (including the processing of gift aid applications)
 - To inform you of news, events, activities being run or attended by us;
 - To ensure and evidence your suitability if volunteering for a role in Scouting;
 - To contact your next of kin in the event of an emergency;
 - To ensure you have and maintain the correct qualifications and skills;
 - To protect a person's health and safety whilst in the care of the 25th Purley (St. Mark's) Scout Group;
 - To respect a person's beliefs with regards to activities, food and holidays; and
 - For equal opportunities monitoring and reporting requirements to our District, County or The Scout Association.
- If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided on our Website

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, "**Cookies**") to collect and use personal information about you. By continuing to use the Website, you are agreeing to our placing cookies in accordance with the terms of this policy.

- What Are Cookies
 - As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.
- How We Use Cookies
 - We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.
- Disabling Cookies
 - You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of this site. Therefore it is recommended that you do not disable cookies.
- The Cookies We Set
 - Account related cookies
 - If you create an account with us then we will use cookies for the management of the signup process and general administration. These cookies will usually be deleted when you log out however in some cases they may remain afterwards to remember your site preferences when logged out.
 - Login related cookies

- We use cookies when you are logged in so that we can remember this fact. This prevents you from having to log in every single time you visit a new page. These cookies are typically removed or cleared when you log out to ensure that you can only access restricted features and areas when logged in.
- Email newsletters related cookies
 - This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.
- Orders processing related cookies
 - This site offers e-commerce or payment facilities and some cookies are essential to ensure that your order is remembered between pages so that we can process it properly.
- Forms related cookies
 - When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.
- Site preferences cookies
 - In order to provide you with a great experience on this site we provide the functionality to set your preferences for how this site runs when you use it. In order to remember your preferences we need to set cookies so that this information can be called whenever you interact with a page is affected by your preferences.
- Third Party Cookies
 - In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.
- How long do Cookies last?
 - Cookies can be placed either for an individual “session” or on a “persistent” basis.
 - Session cookies are temporary and will expire at the end of a browser session; that is, when you leave a website. Session cookies allow a website to recognise you and carry information as you navigate between pages during a single browser session and allow you to use the website efficiently.
 - Persistent cookies remain in the cookie file of your browser even after you leave a website and after the browser is closed. These cookies remain valid until their set expiry date unless deleted by a user manually beforehand. These cookies allow a website to collect and analyse on an anonymous basis the traffic and usage of the website, monitor the system and improve operating performance.
- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.
- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.
- We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; Facebook, Twitter, Instagram, Vimeo and YouTube, will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

How does the 25th Purley (St. Mark’s) Scout Group keep my personal information secure?

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. Specific measures we use include encrypting personal information insofar as possible in rest and ensuring all data is

controlled, stored, utilised and accessible by a specific group of controlled individuals with limited access.

We may store personal information on Compass, which is the online membership system of the Scout Association. Printed records and data will be held whilst running events, camps and courses and will be securely destroyed at the end of each event.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

Specifically, our Website servers are located in the USA. This means that when we collect your personal information we may process it in the US. However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Privacy Notice and in accordance with GDPR compliance obligations.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

Your data protection rights

You have the following data protection rights:

- If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “Contact Us” section of our Website.
- In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the “Contact Us” section of our Website.
- You have the right to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “Contact Us” section of our Website.
- Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).)
- We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Covid-19

We will conduct screening information regarding risk factors relating to Covid-19, as mandated by The Scout Association, Public Health England (“PHE”), The UK Government and/or our own risk assessment, safety and security policies. This may include special categories of data relating to health, race/ethnicity. The provision by you of such information as part of our return to face to face Scouting, Operating Procedures and Covid-19 Risk Assessment (either through physical, electronic or verbal means) constitute your consent to the processing, handling and sub-processing of such information in accordance with this Privacy Policy.

We process data specifically relating to our Covid-19 procedures in order to protect the interests of all members of the 25th Purley (St. Mark’s) Scout Group, families, visitors and associates, ensuring all sessions, activities and contact is fully assessed and any risk factors mitigated. In our legitimate interest and to protect your interest, we may share your information with a governmental or regulatory organisation (such as the UK Government, the National Health Service (including, but not limited to NHS Test and Trace) or Public Health England) to assist in Covid-19 contact tracing or other mandatory requirements. We may also share this information with The Scout Association or our District (Croydon Scouting) to the minimum extent required.

We will retain and update the risk screening information you provide us in electronic format for (the longer of) 180 calendar days, or for as long as mandated by The Scout Association or any governmental or regulatory authority. Each register of attendees will be retained in its original form for at least 6 weeks (forty two calendar days) days after each event.

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.

You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us via dataprotection@25thpurley.org.uk

Privacy and Security

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[Privacy Policy](#)

[Covid 19 Risk Assessment](#)

[Covid 19 Operating Procedures](#)

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