



MK Snap Privacy Statement (for our supporters, our learners and the parents/guardians of our learners)

Who we are

MK Snap (Milton Keynes Special Needs Advancement Project) ("**we**", "**us**" and "**our**") are located at 20 Bourton Low, Walnut Tree, Milton Keynes, MK7 7DE with registered charity number 1013148. Your privacy is important to us. We are committed to safeguarding the privacy of your information. This privacy statement sets out how we, as data controller, collect and use your personal information, why we use it, with whom we share it, the rights to which you may be entitled and your choices about our use of your personal information.

Why are we collecting your data?

MK Snap needs to collect personal information from you in order to fulfil our role as a charitable organisation, to provide, monitor and assess the quality of our services, perform our contract with you (if applicable), fundraise, to comply with legal obligations and for other purposes set out in the table below. The purposes for which we process your personal information are set out in more detail in the tables below.

Please be aware that, in certain circumstances, where you do not provide personal information that is required by us, we will not be able to provide our services under our contract with you or may not be able to comply with a legal obligation on us. You will be made aware if this situation arises and what the consequences of not providing the personal information will be.

The categories of information that we will collect, how and why we use it are as follows:

If you are a supporter:		
What we collect	How we use it	Why we use it
Information you provide when signing up as a supporter. This information will include your contact details including your name, address, email address as well as date of birth and telephone number.	<ul style="list-style-type: none">• To fulfil our role as a charitable organisation• To monitor and assess the quality of our services and to shape future delivery• To fundraise• To keep you up to date with our activity and events• To promote and advertise our services	We use this information because: <ul style="list-style-type: none">• It's necessary for our legitimate interests (or those of a third party)• You have given your explicit consent

If you are a learner:

What we collect	How we use it	Why we use it
Information you provide when signing up as a learner. This information will include your contact details including your name, address, email address as well as date of birth and telephone number and emergency contacts	<ul style="list-style-type: none"> • Making contact in an emergency • To provide and administer our services • To monitor and assess the quality of our services and to shape future delivery 	<p>We use this information because:</p> <ul style="list-style-type: none"> • It's necessary to perform our contract • It's necessary for our legitimate interests (or those of a third party) • It is necessary to protect your vital interests • It is necessary for compliance with a legal or regulatory obligation
Characteristics (such as gender, ethnicity, language, nationality, country of birth, religion)	<ul style="list-style-type: none"> • To provide and administer our services • To monitor and assess the quality of our services and to shape future delivery 	<p>We use this information because:</p> <ul style="list-style-type: none"> • You have given your explicit consent
Sensitive health information (such as physical and learning disabilities, medical history and communication disabilities, mental health & chronic conditions).	<ul style="list-style-type: none"> • To provide and administer our services • To monitor and assess the quality of our services and to shape future delivery • To fulfil our obligations to keep you safe under our duty of care, including your health & safety and safeguarding • 	<p>We use this information because:</p> <ul style="list-style-type: none"> • You have given your explicit consent • It is necessary to protect your vital interests in an emergency or those of another person
Financial information including your bank account details (if you pay us directly)	<ul style="list-style-type: none"> • To take payment from you 	<p>We use this information because:</p> <ul style="list-style-type: none"> • It's necessary to perform our contract

If you are a parent or guardian of a learner:

What we collect	How we use it	Why we use it
Information you provide when signing up the person under your care as a learner. This information	<ul style="list-style-type: none"> • Making contact in an emergency • To provide and 	<p>We use this information because:</p> <ul style="list-style-type: none"> • It's necessary to perform our

<p>will include your contact details including your name, address, email address as well as and telephone number for emergency contact.</p>	<p>administer our services and to shape future delivery</p> <ul style="list-style-type: none"> • To monitor & assess the quality of our services • To fulfil our obligations to keep learners safe under our duty of care, including their health & safety and safeguarding 	<p>contract</p> <ul style="list-style-type: none"> • It's necessary for our legitimate interests (or those of a third party) • It is necessary for compliance with a legal or regulatory obligation
<p>Financial information including your bank account details (if you pay us directly)</p>	<ul style="list-style-type: none"> • To take payment from you 	<p>We use this information because:</p> <ul style="list-style-type: none"> • It's necessary to perform our contract

When do we have "legitimate interests"?

As mentioned above, we can, sometimes, use your personal information where this is necessary for MK Snap's legitimate interests (or those of a third party).

This includes where use of your personal information is necessary for:

- fulfilment of our contract with funders;
- understanding and responding to feedback;
- researching and analysing our services;
- improving our services;
- maintaining a public profile on both traditional and social media;
- developing and maintaining relationships with suppliers, funders, partners and other companies and dealing with individuals who work for them;
- maintaining suppression records to ensure we have a record of your objection/withdrawal of consent to direct marketing (if given);
- hosting data in the cloud for archiving purposes; and transfer of personal data in relation to the transfer or re-organisation of all or part of MK Snap.

Legal requirements

We need to collect certain types of information for compliance with legal requirements relating to our duty of care (including health and safety and safeguarding) obligations. If this information is not provided we cannot agree to provide our services to you (if you are a learner) or to the person under your care (if you are a parent or guardian of a learner).

Your personal information may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body or agency or in the defence of a legal claim. We

will not delete personal information if relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved.

Storing your data

We hold your data for varying lengths of time depending on the type of information in question but in doing so we always comply with applicable Data Protection legislation. As a guide:

- If you are a **supporter** we will keep your data for: A maximum of 7 years following your last engagement with MK Snap
- If you are a **learner or parent or guardian of a learner** we will keep your data for: A maximum of 6 Years following your last day of attendance at MK Snap

Who do we share your information with?

We will transfer your personal data to employees, contractors and to other third parties in specific circumstances as set out below:

- **IT service providers including IT platform providers.** They may process your personal data for us to support our IT systems, provide maintenance services for our IT systems, data hosting and processing services.
- **Court of other legal/regulatory body.** If we're required to by law, or under any regulatory code or practice we follow, or if we are asked by any public or regulatory authority – for example the Police;
- If we are defending a legal claim your information may be transferred as required in connection with defending such claim.

Your personal data may be shared if it is made anonymous and aggregated, as in such circumstances the information will cease to be personal data.

Your privacy rights

We've listed the rights you have over your information and how you can use them below. These rights are subject to restrictions in the European General Data Protection Regulations and, subject to the exemptions in that law, may only apply to certain types of information or processing. To make a request for your personal information contact Steph Passfield, Head of Support Services at steph.passfield@mksnap.org.

- **Withdrawal of consent:** you can remove your consent, where you have provided it, at any time.
- **Access:** you may have the right to request confirmation that we are processing your information and, if we are, to request a copy.
- **Correction:** you may have the right to request that we rectify inaccurate personal information about you.
- **Restriction:** you may have the right to request that we do not use the personal information you have provided (e.g. if you believe it to be inaccurate).
- **Portability:** you may have the right to ask us to help you move your information to other companies.
- **Objection:** where we are processing your personal information based on a legitimate interests (or those of a third party) you may challenge this. However we may be entitled to continue processing your information based on our legitimate interests or where this

is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Erasure:** you may have the right to request that we erase personal data about you.

You can read more about these rights on the ICO website – see link below:

<https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>.

Direct Marketing

We may use the information you give us on our website or when signing up as a supporter, learner or parent/guardian of a learner for direct marketing purposes to provide updates; newsletters; events; or other communications that we think may interest you. We will only do this with your consent (where required by law).

You can opt-out of receiving directing marketing from us at any time. You can do this by clicking on the "unsubscribe" link included at the end of any marketing email we send to you, or by contacting marketing@mksnap.org

Contact Details:

For further information on how your information is used, how we maintain the security of your information or if you would like to discuss anything in this privacy notice please contact Angela Novell CEO MK Snap at angela.novell@mksnap.org

Complaints

If you have a concern about the way we are collecting or using your personal data, you can raise your concern with us by contacting Angela Novell, CEO MK Snap at angela.novell@mksnap.org

You also have the right to complain to the relevant supervisory authority. In the UK the supervisory authority is the Information Commission's Office and you can raise a complaint with them at <https://ico.org.uk/concerns/> .

Changes to the policy

This policy will be changed from time to time.

If we change anything important about this policy (the information we collect, how we use it or why) we will highlight those changes [by providing a copy of the amended privacy notice to you by email or in hard copy].

If you would like to access previous versions of this policy please email Steph Passfield, Head of Support Services MK Snap, you can get in touch at the following email address:

steph.passfield@mksnap.org

Dated June 2018