



Make Space for Girls: Data Processing and Privacy Statement

Introduction

Make Space for Girls understands that privacy and data protection are very important and we care about how your personal data is used. We will collect and use personal data in ways that are described here, and in a manner that is consistent with our obligations and your rights under the law.

We have implemented this privacy notice to inform you of the types of data we process about you. We also include within this notice why we process your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data. We will amend this policy from time to time to ensure it remains up-to-date and accurate.

Personal data is defined as *“any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier”*. Or, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name, and contact details, but it also covers less obvious information, such as identification numbers, electronic location data and other online identifiers.

Who is Make Space for Girls?

Make Space for Girls is a charitable incorporated organisation (or CIO) which is registered with the Charity Commission with charity number 1193772. Our registered office is a 3 Gentle Street Frome BA11 1 JA. We can be contacted by email on Makespaceforgirls@gmail.com.

Make Space for Girls is a data controller for the purposes of the Data Protection Act 2018 and is registered with the Information Commissioner’s Office.

How can you access your Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it. This is known as a “subject access request”. All subject access requests should be made in writing and sent to the email or postal address above.

Links to other websites

Our website may contain links to other websites run by other organisations. This policy does not apply to websites run by other organisations, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other websites even if you access those using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the privacy policy of that third party site.

Children and Young people

We do not generally process personal data of children and young people under 18. However if we do so (for example as part of a volunteering programme) we will explain to the child or young person why we require the personal data we have asked for, and what we will do with it, in a way which they can understand. Fairness, and compliance with the data protection principles, are central to all our processing of children's personal data. We recognise that children and young people have the same rights as adults over their personal data which they can exercise as long as they are competent to do so. Where a child or young person is not considered to be competent, an adult with parental responsibility may usually exercise the child's data protection rights on their behalf.

As a matter of good practice, we explain the risks inherent in the processing, and how we intend to safeguard against them, in a child friendly way, so that children (and their parents) understand the implications of sharing their personal data.

We tell children what rights they have over their personal data in language they can understand.

We recognise that in the UK, children under the age of 13 cannot give consent to the processing of data. As a practical matter, if we intend to process the data of any person under 16 we will seek parental/guardian consent.

When relying on consent, we make sure that the child understands what they are consenting to, and we do not exploit any imbalance of power in the relationship between us. When relying upon 'legitimate interests', we take responsibility for identifying the risks and consequences of the processing, and where appropriate put age appropriate safeguards in place.

Who do we collect personal data from and what type of information do we collect?

We only collect personal information when you provide it to us. This may happen when you visit our website, sign up to a Newsletter or an event, make a donation (either directly or through Givey), contact us for information or to provide support, or interact with us on social media. If you are under a statutory or contractual obligation to provide us with personal data (for example if you are an employee) we will let you know.

We collect personal data from our trustees, people who work and/or volunteer with us, professionals and academics with whom we engage as part of our work and members of the public who are interested in or support the work that we do. The personal information we collect, store and use might include:

- your name and contact details (including email address, but we may also hold your postal address and phone number);
- your date of birth;
- job title and organisation;
- information about what aspects of our work you are interested in;
- information about your activities on our website and about the device used to access it, for instance your IP address and geographical location;

- your bank or credit card details. If you make a donation online or make a purchase, your card information is not held by us, it is collected by our third party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions;
- information as to whether you are a UK taxpayer so we can claim gift aid; and
- any other personal information shared with us.

Data protection laws recognise certain categories of personal information as sensitive and therefore requiring greater protection, for example information about your health, ethnicity and religion. We do not usually collect sensitive data about you unless there is a clear and valid reason for doing so and data protection laws allow us to. Where appropriate, we will make it clear why we are collecting this type of information and what it will be used for.

The purpose of our processing: how and why is your information used

We may use your information for a number of different purposes, which may include:

- sending you communications that may be of interest to you. These may include information about our campaigns, fundraising appeals and activities;
- understanding how you use parks and similar spaces, and the public realm, your views on these spaces and associated issues such as safety, self-image, transport, leisure and sport activity;
- seeking your views on the issues that we campaign on;
- providing you with the services, products or information;
- carrying out our obligations under any contracts entered into between you and us;
- keeping a record of your relationship with us;
- seeking your views or comments on the work that we are doing.

How long is your information kept for?

We keep your information for no longer than is necessary for the purposes it was collected for. The length of time we retain your personal information for is determined by operational and legal considerations. For example, we are legally required to hold some types of information to fulfil our statutory and regulatory obligations (e.g. health/safety and tax/accounting purposes).

We review our retention periods on a regular basis.

Your information and third parties

We do not sell or rent your information to third parties. We do not share your information with third parties for marketing purposes. However, we may disclose your information to third parties in order to achieve the other purposes set out in this policy. These third parties may include:

our third party service providers, and other associated organisations to complete tasks and providing services to you on our behalf (for example to process donations and send you mailings). However, when we use these third parties, we disclose only the personal information that is necessary to deliver the services. We will not release your information to third parties for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime.

Lawful Processing

Data protection law requires us to rely on one or more lawful grounds to process your personal information. We consider the following grounds to be relevant:

Legitimate Interest: where it is reasonably necessary to achieve our or others' legitimate interests (as long as what the information is used for is fair and does not duly impact your rights). We consider our legitimate interests to be operating Make Space for Girls as a charity, in line with our charitable objectives. For example to:

- send communications which we think will be of interest to you;
- conduct research to better understand the issues that create barriers to the use of parks and similar spaces by teenage girls, how things could be improved and monitoring interventions; and to better understand our supporters and to improve the relevance and effectiveness of the work we are doing;
- determine the impact and reach of our work;
- better understand how people interact with our website and social media;
- monitor who we deal with to protect the charity against fraud, money laundering and other risks.

When we legitimately process your personal information in this way, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information where our interests are overridden by the impact on you.

When we use sensitive personal information, we require an additional legal basis to do so under data protection laws, so will either do so on the basis of your explicit consent or another route available to us at law.

Consent: Where you have provided specific consent to us using your personal information in a certain way, such as to send you one of our Newsletter by email or if you have taken part in a workshop, focus group or other event where we have asked for your consent eg to take photos.

Legal Obligation: Where necessary so that we can comply with a legal or regulatory obligation to which we are subject, for example where we are ordered by a court, or other official body, like the Charity Commission or Fundraising Regulator.

Performing a Contract: if we have entered into a contract with you we may need to process your data as part of performing that contract.

Vital Interests: Where it is necessary to protect life or health (for example in the case of medical emergency suffered by an individual at an event) or a safeguarding issue which requires us to share your information.

Your rights under UK data protection laws

UK data protection laws provides you with the following rights in relation to your personal data:

1. The right to be informed
2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object

For a full explanation of these rights, from the Information Commissioner's Office, please click here.

[ICO guide to your rights](#)

Transferring your data outside the UK and automated decision making

We do not transfer your personal data outside the UK and we do not undertake any automated decision making.

How do you “opt-out” or change details of your Personal Data?

You can “opt-out”/withdraw consent or change details to your personal data, at any time. This can be done in writing and sent to the following email or address:

Postal address: Make Space for Girls: 3 Gentle Street Frome BA11 1 JA.

Email address: Makespaceforgirls@gmail.com.

We will respond to your written request within seven working days of receiving it, confirming that we have adhered to your wish.

How to make a formal complaint regarding your Personal Data

If you want to make a complaint to us regarding your Personal Data, this can be done in writing and sent to the following email or address. We will seek to resolve your complaint as efficiently and effectively as we can.

Postal address: Make Space for Girls: 3 Gentle Street Frome BA11 1 JA.

Email address: Makespaceforgirls@gmail.com.

If you want to make a formal complaint to the Information Commissioner’s Office then you can do so by calling 0303 123 1113, emailing casework@ico.org.uk, or writing to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Cookies

Cookies are software files that are stored on a computer or mobile device when an individual visits a website. Cookies allow websites to recognise that a user on an individual computer has previously visited the site. The cookies save some information about that user for when they access the site again in the future.

Most modern browsers will offer different ways to configure how they handle cookie. This can vary from only allowing cookies from websites that you trust to blocking all cookies by default. Please note that switching off cookies may restrict your use of the website and/or delay or affect the way in which it operates.

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