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## PRIVACY NOTICE

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**Thriving Through Recreation is a Charitable Incorporated Organisation registered with the Charities Commission in England and Wales (1204822). We are committed to protecting the privacy and security of your personal data and we will only collect the data that we need in order to run our charity.**

**This privacy notice outlines our commitment to data protection and data security, and our procedures for collecting, processing, and storing personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).**

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### 1. Definitions

- Data Controller: Thriving Through Recreation
- Personal Data: Any information relating to an identified or identifiable living individual (e.g. names, addresses, email addresses, staff/volunteer records, beneficiary details, donor history).
- Special Category Data: Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life or sexual orientation.
- Processing: Any operation performed on personal data, such as collection, recording, organisation, storage, retrieval, use, disclosure, or erasure.

- ICO: The Information Commissioner’s Office, the UK’s independent body set up to uphold information rights.

## 2. Data Protection Principles

The UK Data Protection Act (2018) and the General Data Protection Regulations requires personal data to be processed according to seven key principles. Thriving Through Recreation adheres to these principles:

Principle	Our Commitment
<b>1. Lawfulness, fairness and transparency</b>	We will clearly and honestly inform you about how your data is used, and only process it when we have a lawful basis to do so.
<b>2. Purpose limitation</b>	We will only collect personal data for specified, explicit, and legitimate purposes.
<b>3. Data minimisation</b>	We will only process the minimum amount of personal data necessary for our specified purpose.
<b>4. Accuracy</b>	We will take reasonable steps to ensure personal data is accurate and, where necessary, kept up to date.
<b>5. Storage limitation</b>	We will only keep personal data for as long as is necessary for the purposes for which was collected.
<b>6. Integrity and confidentiality (security)</b>	We will ensure that personal data is protected against unauthorised or unlawful processing, and against accidental loss, destruction, or damage.
<b>7. Accountability</b>	We will be able to demonstrate compliance with the other six principles (through records, policies, and training).

### 3. Data Collection

#### 3.a. What data we collect

We collect the necessary personal information that enables us to fulfil our mission to support equitable access to recreational activities for children and young people. Personal information is any information that can be used to identify someone. Special category data is information about racial or ethnic origin, sexual life or orientation, religious beliefs, physical or mental health/condition, and details of proceedings in connection with an offense or an alleged offence.

The information we collect varies depending on your involvement with Thriving Through Recreation. We collect and process the following information:

Involvement with Thriving Through Recreation	The data we collect
<p><b>Grant Recipients and their Families</b></p>	<ul style="list-style-type: none"> <li>• Contact Information: including names, addresses, email addresses, phone numbers.</li> <li>• Communications: including emails, text messages, voicemails, WhatsApp messages, and records of verbal conversations.</li> <li>• Relevant Personal Data: including dates of birth, needs assessments, financial circumstances, languages spoken, involvement with other agencies, and relevant past experiences or needs.</li> <li>• Family Data: including others living at</li> </ul>

	<p>the family home.</p> <ul style="list-style-type: none"> <li>● Special Category Data: could include racial or ethnic origin, health and medical conditions, religious or political beliefs, or sexual orientation.</li> <li>● Criminal Offence Data: could include criminal offences, allegations, proceedings or convictions, and descriptions of criminal incidents.</li> <li>● Education Data: including school or nursery names, previous learning engagement, and the funded activity attendance and progress.</li> <li>● Evaluation Data: including feedback you share with us when we have reviews or send you questionnaires or surveys.</li> <li>● Marketing Data: including direct marketing preferences such as whether you agreed to receive emails or newsletters from us.</li> </ul>
<p><b>Referring Professionals</b></p>	<ul style="list-style-type: none"> <li>● Contact Information: including names, addresses, email addresses, phone numbers.</li> <li>● Communications: including emails, text messages, voicemails, WhatsApp messages, and records of verbal conversations.</li> <li>● Relevant Personal Data: including job titles and employers.</li> <li>● Marketing Data: including direct marketing preferences such as whether you agreed to receive emails or newsletters from us.</li> <li>● Evaluation Data: including feedback you share with us when we have reviews or send you questionnaires or surveys.</li> </ul>

<p><b>Activity Providers</b></p>	<ul style="list-style-type: none"> <li>• Contact Information: including names, addresses, websites, email addresses, phone numbers.</li> <li>• Communications: including emails, text messages, voicemails, WhatsApp messages, and records of verbal conversations.</li> <li>• Financial Data: including payment instructions, and may include bank account or card details, billing address for sole traders.</li> <li>• Evaluation Data: including feedback you share with us when we have reviews or send you questionnaires or surveys.</li> <li>• Marketing Data: including direct marketing preferences such as whether you agreed to receive emails or newsletters from us.</li> <li>• Criminal Offence Data: for safeguarding and fraud prevention purposes this could include criminal offences, allegations, proceedings or convictions, and descriptions of criminal incidents.</li> </ul>
<p><b>Donors</b></p>	<ul style="list-style-type: none"> <li>• Contact Information: including names, addresses, email addresses, phone numbers.</li> <li>• Relevant Personal Data: including gift aid declarations, and where applicable for the prevention of fraud connections to the charity, the mechanism for the donation and/or whether it has been received via a third party.</li> <li>• Communications Data: including emails and records of conversations.</li> <li>• Financial Data: including payment instructions, and may include bank</li> </ul>

	<p>account or card details, billing address and gift aid details.</p> <ul style="list-style-type: none"> <li>• Donation Data: including details about donations made to us.</li> <li>• Marketing Data: including direct marketing preferences such as whether you agreed to receive emails or newsletters from us.</li> <li>• Criminal Offence Data: where applicable, for crime prevention and legal proceedings purposes, this could include criminal offences, allegations, proceedings or convictions, and descriptions of criminal incidents.</li> <li>• Evaluation Data: including feedback you share with us when we have reviews or send you questionnaires or surveys.</li> </ul>
<p><b>Website Users</b></p>	<ul style="list-style-type: none"> <li>• Technical Data: including internet protocol (IP address), browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the device you use.</li> <li>• Usage Data: including information about your activity on our website, such as the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); elements you viewed; page response times; download errors, length of visits; interaction information (such as scrolling, clicks, and mouse-overs).</li> <li>• Contact Data: if users contact us via the website, this includes names, email addresses and telephone</li> </ul>

	<p>numbers.</p> <ul style="list-style-type: none"> <li>• Communication Data: including any messages received via the website.</li> </ul>
<p><b>Volunteers, including Trustees</b></p>	<ul style="list-style-type: none"> <li>• Contact Information: including names, addresses, email addresses, phone numbers.</li> <li>• Communications: including emails, text messages, voicemails, WhatsApp messages, records of verbal conversations, application forms, interview records, and any records for the purposes of HR procedures.</li> <li>• Relevant Personal Data: including dates of birth, DBS status, professional background, support needs, and languages spoken.</li> <li>• Financial Data: including bank details for the disbursement of expenses.</li> <li>• Marketing Data: including direct marketing preferences such as whether you agreed to receive emails or newsletters from us.</li> <li>• Special Category Data: could include nationality, health and medical conditions.</li> <li>• Criminal Offence Data: could include criminal offences, allegations, proceedings or convictions, and descriptions of criminal incidents.</li> <li>• Education Data: could include educational background and qualifications.</li> <li>• Evaluation Data: including feedback you share with us when we have reviews or send you questionnaires or surveys.</li> </ul>

<p><b>Staff</b></p>	<ul style="list-style-type: none"> <li>• Contact Information: including names, addresses, email addresses, phone numbers.</li> <li>• Communications: including emails, text messages, voicemails, WhatsApp messages, records of verbal conversations, application forms, interview records, and any records for the purposes of HR procedures.</li> <li>• Relevant Personal Data: including dates of birth, right-to-work checks, DBS status, professional background, support needs, and languages spoken.</li> <li>• Financial Data: including bank account details for the purposes of payroll.</li> <li>• Marketing Data: including direct marketing preferences such as whether you agreed to receive emails or newsletters from us.</li> <li>• Special Category Data: could include nationality, health and medical conditions.</li> <li>• Criminal Offence Data: could include criminal offences, allegations, proceedings or convictions, and descriptions of criminal incidents.</li> <li>• Education Data: could include educational background and qualifications.</li> <li>• Evaluation Data: including feedback you share with us when we have reviews or send you questionnaires or surveys.</li> </ul>
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We also collect, process and use aggregated data, such as statistical, evaluation and demographic data. We use this to evaluate the impact of our activities. It can

also be used for fundraising purposes. Aggregated data is not considered personal data in law because it does not directly or indirectly reveal your identity.

If aggregated data is ever connected with your personal data, such that you are directly or indirectly identifiable, we will treat the data as personal data in accordance with this privacy policy.

### **3.b. How we collect data**

We collect data from you in different ways, with most identifiable information given to us directly by you with consent, or with your explicit consent through a third party, such as your supporting referring professional.

We collect data in the following ways:

<b>Involvement with Thriving Through Recreation</b>	<b>How we collect the data</b>
<b>Grant Recipients and their Families</b>	Data is submitted using our online application form provided by GoogleForms. Further data for assessing applications, awarding grants and supporting families, and monitoring our efficacy may be collected during phone calls, video calls, emails, text messages and WhatsApp, liaison with the relevant activity provider, and via surveys and questionnaires provided by GoogleForms.
<b>Referring Professionals</b>	Your data is submitted using our online application form provided by GoogleForms. Further data for assessing applications, awarding grants and supporting families, and monitoring our efficacy may be collected during phone calls, video calls,

	<p>emails, text messages and WhatsApp, and via surveys and questionnaires provided by GoogleForms.</p>
<b>Activity Providers</b>	<p>Any data may be submitted onto our online application form provided by GoogleForms. Further data for assessing applications, awarding grants and supporting families, and monitoring the efficacy of our grants may be collected during phone calls, emails, text messages and WhatsApp.</p>
<b>Donors</b>	<p>Data may be given to us through direct interaction by corresponding with us in person or by phone, post, email, or otherwise. This includes personal data given by you to enable us to discuss and process your donation.</p> <p>Data is also collected via our third-party fundraising platform, JustGiving, and when you subscribe or unsubscribe to our marketing activities.</p>
<b>Website Users</b>	<p>Data may be given to us by submitting it on our website. It is also automatically collected by Wix Analytics, our website provider by using cookies and other similar technologies.</p>
<b>Volunteers, including Trustees</b>	<p>Data is submitted to us directly by you during the application and interview process, and HR procedure for the duration of your tenure.</p> <p>Further data is collected through any correspondence via emails, text messages, WhatsApp and records of conversations.</p>
<b>Staff</b>	<p>Data is submitted to us directly by you during the application and interview process, and HR procedure for the duration of your tenure. This includes any references</p>

	<p>obtained, and any information recorded, during the course of those due diligence checks that we are legally obliged to conduct before offering a contract of employment.</p> <p>Further data is collected through any correspondence via emails, text messages, WhatsApp and records of conversations.</p>
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## 4. Lawful Basis for Processing

Before processing your personal data, Thriving Through Recreation must identify and document a valid lawful basis. For our charity activities (e.g. staff, volunteers, beneficiaries, donors), we rely on the following bases:

- Consent: You have given clear consent for us to process your personal data for a specific purpose.
- Contract: The processing is necessary for a contract we have with the individual.
- Legitimate Interests: The processing is necessary for our legitimate interests as a charity (e.g., some non-intrusive fundraising/ mailing to existing supporters and administering events or services), unless those interests are overridden by the individual's rights and freedoms.
- Legal Obligation: The processing is necessary for us to comply with the law (e.g., reporting to HMRC, Charity Commission, safeguarding duties).
- Vital Interests: The processing is necessary to protect someone's life.
- Public Task: The processing is necessary to perform a task in the public interest.

Involvement with Thriving Through Recreation	Lawful Basis
<p><b>Grant Recipients and their Families</b></p>	<p>Necessary for our legitimate interests and/or consent and/or legal,</p> <p>including:</p> <ul style="list-style-type: none"> <li>● To assess, award, process and review grants.</li> <li>● To communicate with you.</li> <li>● To administer our work and support you.</li> <li>● To manage our relationship with you.</li> <li>● To keep records up-to-date.</li> <li>● To evaluate our grants programme.</li> <li>● To fundraise.</li> <li>● To inform strategy, shape eligibility criteria and our support programme.</li> </ul>
<p><b>Referring Professionals</b></p>	<p>Necessary for our legitimate interests and/or consent and/or legal,</p> <p>including:</p> <ul style="list-style-type: none"> <li>● To assess, award, process and review grants.</li> <li>● To communicate with you.</li> <li>● To administer our work and support you.</li> <li>● To manage our relationship with you.</li> <li>● To keep records up-to-date.</li> <li>● To evaluate our grants programme.</li> <li>● To fundraise.</li> <li>● To inform strategy, shape eligibility criteria and our support programme.</li> </ul>
<p><b>Activity Providers</b></p>	<p>Necessary for our legitimate interests,</p> <p>including:</p>

	<ul style="list-style-type: none"> <li>● To assess, award, process and review grants.</li> <li>● To communicate with you.</li> <li>● To administer our work.</li> <li>● To manage our relationship with you.</li> <li>● To evaluate our grants programme.</li> <li>● To keep children and young people safe.</li> <li>● To fundraise.</li> </ul>
<b>Donors</b>	<p>Necessary for our legitimate interests and/or consent and/or legal,</p> <p>including:</p> <ul style="list-style-type: none"> <li>● To process gift aid.</li> <li>● To communicate with you.</li> <li>● To manage our relationship with you.</li> <li>● To inform our fundraising strategy..</li> <li>● To fundraise.</li> </ul>
<b>Website Users</b>	<p>Necessary for our legitimate interests and/or consent,</p> <p>including:</p> <ul style="list-style-type: none"> <li>● To keep our website up-to-date, relevant and accessible.</li> <li>● To fundraise.</li> <li>● To inform strategy to raise public awareness and understanding of our work.</li> </ul> <p>Cookies are used on our website. Consent is requested.</p>
<b>Volunteers, including Trustees</b>	<p>Necessary for our legitimate interests and/or consent and/or legal and/or contract,</p>

	<p>including:</p> <ul style="list-style-type: none"> <li>● To support your recruitment and position with us.</li> <li>● To communicate with you.</li> <li>● To administer our work.</li> <li>● To keep children and young people safe.</li> <li>● To keep you safe.</li> <li>● To manage our relationship with you.</li> <li>● To evaluate our grants programme.</li> <li>● To fundraise.</li> </ul>
<p><b>Staff</b></p>	<p>Necessary for our legitimate interests and/or consent and/or legal and/or contract,</p> <p>including:</p> <ul style="list-style-type: none"> <li>● To support your recruitment and position with us.</li> <li>● To communicate with you.</li> <li>● To administer our work.</li> <li>● To keep children and young people safe.</li> <li>● To keep you safe.</li> <li>● To manage our relationship with you.</li> <li>● To evaluate our grants programme.</li> <li>● To fundraise.</li> </ul>

For Special Category Data, we get both your explicit consent and satisfy the condition that it is necessary as part of our charitable purposes.

## 5. Data Subject Rights

You have rights over your personal data. Thriving Through Recreation has procedures to ensure these rights are respected:

Right	Description	Our Action
<b>Right to be informed</b>	You have the right to know how their data is being used.	We provide clear Privacy Notices at the point of data collection.
<b>Right of access</b>	You have the right to request a copy of their personal data. (Subject Access Request)	We will respond within one calendar month, free of charge (unless the request is excessive or unfounded).
<b>Right of rectification</b>	You can ask for inaccurate data to be corrected.	We will update records without undue delay.
<b>Right to erasure</b>	You can ask for their data to be deleted. (Right to be Forgotten)	We will erase data where there is no compelling reason for its continued processing.
<b>Right to restrict processing</b>	You can block or suppress the processing of their data in certain circumstances.	We will restrict processing as required.
<b>Right to data portability</b>	You can request their data be provided in a structured, commonly used, machine-readable format.	We will provide data in a suitable format where the legal basis is consent or contract.
<b>Right to object</b>	You can object to processing based on legitimate interests or direct marketing.	We will stop processing data for direct marketing immediately upon request.
<b>Rights related to automated decision making and profiling</b>	Protection against decisions based solely on automated processing without human intervention.	We will ensure human review in relevant situations.

There is not normally a fee for you to exercise these rights.

To make a data protection request you can contact us at [contact@thrivingthroughrecreation.co.uk](mailto:contact@thrivingthroughrecreation.co.uk).

In some cases, we may need to confirm identities and rights to access personal data in order to ensure that no personal data is ever disclosed to anyone who does not have a right to receive it.

We will respond within one calendar month to any request. If a request is particularly complicated it may take us longer to respond, and we will keep the individual informed.

If you have any concerns about how we use personal data, complaints can be made to [imogen@thrivingthroughrecreation.co.uk](mailto:imogen@thrivingthroughrecreation.co.uk).

If, after raising a complaint, you continue to have concerns about how we have used data you can make a complaint at any time to the Information Commissions's Office (ICO), the UK authority for data protection. Further information can be found at <https://www.ico.org.uk>.

## 6. Data Sharing

There are circumstances in which Thriving Through Recreation is required by law to share information to external authorities or organisations. These external parties will have their own policies relating to the protection of any data they collect.

In cases of suspected child abuse and safeguarding concerns, it may be necessary to pass personal data on to social workers or other support agencies in order to protect the welfare of children and young people.

Personal data is shared with, and accessed by, any IT and software engineering contractors working on behalf of Thriving Through Recreation to build and support the efficacy of our software systems.

Personal and financial data will be shared with any contractors or volunteers working on behalf of Thriving Through Recreation to complete independent examination or auditing of our accounts in order to comply with the Charities Act. Given the nature of Thriving Through Recreation's work, it is possible that some sensitive data could be shared, where relevant, for the purposes of this activity.

Personal data is also indirectly shared with organisations who provide us with technological services such as cloud storage, operational software, platforms and services, or website systems. These include Google LLC, Microsoft, Apple, and Wix as providers of email, cloud storage, and website systems. Their servers may be located around the world. They will have their own technological safeguards in place to protect data.

We share anonymised data with funders and evaluation partners for the purposes of fundraising and efficacy analysis.

## 7. Data Security and Confidentiality

We implement the appropriate technical and organisational measures to ensure a level of security appropriate to the risk contained in our Data Security Policy and Procedures. This includes:

- Access Control: Limiting access to personal data to only those staff and volunteers who need it to perform their duties.
- Anonymisation: Where possible we anonymise sensitive data.
- Physical Security: Storing hard copy personal data in locked cabinets.
- IT Security: Using firewalls, anti-virus software, strong passwords, dual-factor authentication (where possible), and regular backups.
- Data Minimisation: Regularly reviewing data holdings and disposing of data securely when no longer needed.
- Training: All staff and key volunteers receive data protection training.

Our Data Security Policy and Procedures is available on request.

## 8. Data Breaches

A personal data breach is a security incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access to, personal data.

1. Any suspected or actual breach must be reported immediately to the Data Protection Lead: Imogen Loxam, CEO.
2. The Data Protection Lead will investigate and assess the risk to individuals.
3. We will report a breach to the ICO within 72 hours of becoming aware of it, unless the breach is unlikely to result in a risk to the rights and freedoms of individuals,

4. If the risk is *high*, we will also inform the affected individuals without undue delay.

## 9. Roles and Responsibilities

- Trustees: Have overall responsibility for ensuring Thriving Through Recreation complies with UK GDPR.
- Data Protection Lead: Imogen Loxam, CEO, is responsible for
  - Overseeing compliance with the UK GDPR and this policy.
  - Handling Subject Access Requests and Data Subject Rights.
  - Managing data breach reporting.
  - Ensuring staff/volunteer training.
- All Staff and Volunteers: Must read, understand, and comply with this policy, our Data Security Policy and Procedures, and report any potential data breach to the Data Protection Lead immediately.

## 10. Data Retention and Disposal

Personal data will not be kept longer than is necessary for the purpose for which it was collected.

- Thriving Through Recreation maintains a Data Retention Schedule which sets out the maximum period for which different categories of personal data will be kept (e.g. Donor records, Employee files, Grant applicants and recipients case files).
- All personal data will be disposed of securely, e.g. by shredding paper copies and permanently deleting electronic files.

In some circumstances, we may anonymise personal data for research or statistical purposes. It will not be possible to associate specific individuals with this anonymised data. This data may be used indefinitely without further notice.

## II. ICO Registration and Fee

Thriving Through Recreation is registered with the Information Commissioner's Office (ICO) and pays the annual data protection fee.

- Registration Number: ZB667960
- Date Last Annual Renewal: 7.3.25

This privacy notice was last reviewed in February 2026.

It will be reviewed annually, or sooner if there are significant changes to Thriving Through Recreation's data processing activities, IT systems, or relevant legislation.