

# XLP

WORKING TO CREATE POSITIVE  
FUTURES FOR YOUNG PEOPLE



# Young Person's Privacy Notice

XLP is a charity, registered with the Charity Commission in England and Wales (1101095) and a company limited by guarantee, registered in England and Wales (04959458).  
Our address is XLP, All-Hallows-on-the-Wall, 83 London Wall, London EC2M 5ND.

## OUR PROMISE

**You've received this privacy notice because you or your child has been involved in an XLP project.** To make sure our work is safe, we some times need to ask for personal information (data).

XLP wants to make sure the personal information you have given us is well looked after. By the way, personal information is any information that can be used to identify you, such as; your name, phone number, school, or home address.

This notice explains what happens when XLP collects and uses your personal information. By law we have to give you this information so please do take the time to read it. If you'd like to know more about our data protection and privacy policies, please contact our friendly team and we will be happy to help. The person in charge of all the data (our data manager) can be reached by phone on 020 7256 6240, or emailed at [data@xlp.org.uk](mailto:data@xlp.org.uk).

XLP collects and processes your personal data in line with the law; including the Data Protection Act 2018.

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## HOW DO WE COLLECT YOUR INFORMATION?

When you:

- Come to an XLP activity, such as an XL-R8 bus session or an Arts Showcase;
- Apply to join one of our programmes, such as XL-Mentoring;
- Visit our website;
- Are referred by somebody else, such as a parent/carer, teacher, social worker, health professional, etc.

## WHAT INFORMATION MIGHT WE COLLECT?

- Your name and birthday;
- Contact details, such as your postal address and telephone number;
- The school you attend;
- Social media usernames;
- The dates and places of the XLP activity(ies) that you have come to;
- Records of your contact with us;
- Details of conversations that you have with us during activities;
- Information about your development and progress;
- Your photograph (only with your and/or your parent/carer's permission);
- Information gathered via cookies when you visit our website. Please see our cookies policy on our website for more information. <http://www.xlp.org.uk/cookie-policy>

## SENSITIVE PERSONAL INFORMATION

The Data Protection Act says some information is 'sensitive personal data', for example, information on your religious beliefs, health issues, race or ethnic origin.

XLP might collect information about your religious beliefs, as we want to work equally with young people from all faiths and none. Also, we may collect details about any health concerns or disabilities (with your permission), so we can make sure you'll be able to join in our activities and be well looked after. XLP may also collect information about your sexual orientation and ethnic origin to check we are working equally with all young people. We may need to let the people who give money to support our projects know who we've worked with, but we won't personally identify you to them.

XLP will always make sure sensitive personal data is processed with even greater care and in line with the Data Protection Act.

## WHY DO WE COLLECT AND USE YOUR INFORMATION?

- To ensure you can take part in XLP activities;
- To make note of your attendance at our projects & activities;
- To track your progress & development and provide feedback to you;
- To contact you when arranging trips;
- To provide references for you;
- To gather information about which of our website pages you visit to help us improve and provide you with the best service;
- To improve the usefulness of our website;
- To improve your experience on our website;
- To report to those who give money to run our projects and support XLP's work, using collective or anonymous data;
- To write your story (only with your and/or your parent/carer's permission) for use in our publicity and/or for fundraising;
- To help keep you safe;
- To help us keep the law.

## THE LAWFUL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION

We use your personal data in line with the Data Protection Act and other data protection laws. These laws outline that we need to say why we are collecting data. The official main reason we collect your personal information is under the 'basis of legitimate interest'. This means we only collect information that we need from you so we can work with you effectively. We need your information:

- To allow you to come to the activities and projects we offer;
- To look at the benefits to you of attending our activities to make sure what we are doing meets your needs and is helpful;
- To look at the effectiveness of XLP's work across all our projects and activities;
- To measure the benefits of XLP's work in the wider world;
- To give general information to those who

support our projects, to make sure we can continue to have money to run our projects.

We also use some of your data according to the lawful bases of contract (for example, if you make a booking to attend an XLP trip or activity), legal obligation (for example, for keeping you safe), or consent (for example, if we wish to write your story to promote the benefits of the work we do).

## WHO WE SHARE YOUR INFORMATION WITH

XLP does not sell or share your personal data with any other organisations for marketing purposes. Where we have been given information about you (e.g. in a referral) by another organisation or person, such as your school or a social worker, we may provide them (or a wider multi-agency team) with information about your progress and the activities we do with you. Where we run projects or activities with other organisations, we will share only the information received at that project/activity (for example, if you attend a jointly-run bus session, both organisations may record your name and dates of attendance, along with any other information you may share with us at that session). We may be under a duty to reveal your personal information, where required, to make sure we are keeping the law (for example, in relation to keeping you and others safe). We sometimes use other trusted organisations to help us look after your data and communicate with you. If these organisations are outside the European Economic Area (EEA) we require them to look after your personal information using our instructions and in line with the law.

## HOW LONG WE KEEP YOUR DATA

XLP only keeps your personal information for as long as we need it and in line with legal requirements. We will keep your information for seven years after you stop attending our activities and at least until you are aged 25. Where we no longer require information, we will make sure we get remove of it in a secure manner.

## YOUR INFORMATION RIGHTS AND CHOICES

The Data Protection Act (DPA) gives you the following rights:

- To write to XLP asking for copies of the personal information XLP holds about you;
- To correct or update your personal information processed by XLP;
- To ask XLP to delete personal data held by us;
- To ask XLP to restrict the processing of your personal data;
- To withdraw your consent where that is the legal basis of our processing;

You also have the right to 'say no' to XLP processing your personal data for direct marketing purposes. This means you can tell us to stop contacting you if don't want to hear about XLP projects or ways to stay in touch.

The Privacy and Electronic Communications Regulations (PECR) gives you the right:

- To know about the cookies XLP uses, so that you can decide whether to give us permission to store a cookie on your device. Please see the Cookies policy on our website for more information: <http://www.xlp.org.uk/cookie-policy>

For more information about your information rights visit [www.ico.org.uk](http://www.ico.org.uk). If you wish to exercise any of these rights, please contact us.

## REPORTING CONCERNS OR COMPLIMENTS

Please contact us if you are unhappy about XLP's handling of your personal information, or tell us what you think we have done well.

You also have the right to make a complaint to the Information Commissioner's Office about how we manage your data.

## CHANGES TO THIS PRIVACY NOTICE

XLP will review our privacy notice regularly. The terms of this notice may be updated at any time, for example, in the event of changes in law and how we operate. Please do check our website from time to time. If there are any big changes in the way we process your personal information, there will be a notice on our website or we will send you a notification.

If we plan to use your personal data for any new purposes, we will update this privacy notice and provide you with a copy before we change what we do with your data. Where and whenever necessary, we will ask your permission for this new processing.