



PRIVACY POLICY

1. **York Pride** is a voluntary organisation and registered charity whose purpose is: the promotion of equality and diversity particularly in relation to lesbian, gay, bisexual and transgender (LGBT) people; staging an annual LGBT parade and festival in York as well as other events; providing grants/donations to other charitable/voluntary organisations that support the LGBT community. We take seriously our compliance with The Data Protection Act 2018 (DPA 2018), the UK's implementation of the General Data Protection Regulation (GDPR).

2. TRUSTEES

2.1 We maintain contact details (name, telephone number(s), email address and/or postal address) of those individuals who serve as Trustees of York Pride. The identity of Trustees, and some of their personal information, is legally available public information but other personal information will only be disclosed to third parties if a legal requirement arises to do so.

3. VOLUNTEERS

3.1 We maintain contact details (name, telephone number(s), email address and/or postal address) of those individuals who volunteer to work in support of York Pride aims and outputs. This personal information is only available to those York Pride officials who require it to carry out their duties and to third parties in the following situations:

- Pride Officers ('Named Officers', Support Officers and Pride Ambassadors) - those individuals occupying formal appointments may have their names, position, official York Pride email address and any official issued York pride mobile telephone number made public or notified to sponsors, partners and other third parties in relation to the efficient conduct of York Pride business. All Pride Officers are required to sign a Data Protection consent form at their time of appointment. Other personal information, including personal telephone numbers and personal email addresses, will not be disclosed to third parties without the express consent of the individual.
- Event volunteers (including Parade/Festival Marshals) – those who assist in running York Pride events, or participating on behalf of York Pride in third party events, may have their name and in some cases contact telephone number given to other York Pride volunteers participating in the event, statutory bodies, venue owners or a third party event organiser for event management, security and/or insurance and legal purposes.
- Traffic marshals for Pride Parade – responsibility for traffic management on the public roads of York for the duration of the annual parade is invested in a third party approved by York City Council and volunteer traffic marshals (who are distinct from our other marshals) come under their management whilst undertaking these duties and the third party is given the personal details of these volunteers for effective event management and insurance purposes.
- Fundraisers – those who undertake fundraising activities in support of York Pride may have their name and in some cases contact telephone number given to third parties hosting fundraising activities for security reasons.

3.2 We shall retain the personal information of volunteers for up to a year following each annual Pride Parade and Festival. In April each year we shall contact the previous year's volunteers and those who wish to



volunteer for the coming year will be required to complete a new Data Protection consent form. Where no completed consent form is received by 31 May the personal details of that volunteer will be earmarked for deletion from York Pride data records. An individual who no longer wishes to volunteer can request at any time for us to earmark their personal information for deletion. Volunteer personal data earmarked for deletion will be deleted if 90 calendar days have passed since the individual's last volunteering activity with York Pride and there is no other legal or insurance requirement to keep such data for a longer period. (It is kept for these 90 days in case notification of an issue arises related to an event that requires investigation). Individuals will be notified if their personal information cannot be deleted for legal or insurance reasons. From the time the personal data is earmarked for deletion we shall no longer contact that individual, except to advise them of any case where we have to retain their personal details for legal or insurance purposes.

3.3 We do not pass on to third parties the personal details of our volunteers, unless for a reason stipulated above or a legal requirement arises to do so.

4. SPONSORS AND SUPPORTERS

4.1 The term 'sponsor' includes all individuals and organisations, commercial or otherwise, who provide funding and/or goods/services in-kind that allows York Pride events and activities to take place.

4.2 The term 'supporter' includes all individuals and organisations (other than sponsors, volunteers and York Pride officials) involved with York Pride events and activities, including other charity and voluntary organisations, venues, participating Parade groups, Festival stall holders, entertainment acts, 'Wristband Scheme' supporters and sellers, public bodies, commercial contractors and suppliers.

4.3 We maintain contact details (name, position, telephone number(s), email address and postal address) of sponsor and supporter personnel who are assigned to interact with us regarding York Pride business. This personal information is only available to those York Pride officials who require it to carry out their duties.

4.4 We shall retain the personal information of sponsor and supporter personnel at the end of any sponsorship or other agreement only for the sole purpose of pursuing new sponsor or other agreements for future York Pride events and activities unless the sponsor, supporter or individual specifically requests us to delete such personal information.

4.5 We do not pass on to third parties the personal details of our supporters including those who are involved in a sponsoring or other agreement with us, unless a legal requirement arises to do so. Where another sponsor, supporter, organisation or individual seeks such details to further our aims or theirs in support of York Pride or LGBT issues we shall supply the third party details to the sponsor or supporter for them to decide if they wish to engage with the third party.

5. MAILING LISTS¹

5.1 York Pride may set up mailing lists to keep interested parties informed of its activities, events and LGBT issues.

5.2 Where we set up a mailing list those individuals who request to be included on it will be required to complete a Data Protection consent form. We shall only use their details to communicate with them for the purpose for which they have given their contact details. An individual can ask for their details to be removed from a mailing list at any time.

¹ York Pride (as at 1 March 2022) does not engage in direct mailing campaigns to named individuals and therefore does not maintain mailing lists for general marketing purposes. Section 5 will only come in to force should York Pride change its current policy. Mailings to Trustees, Volunteers, Sponsors and Supporters are classed as routine business and covered by Sections 2, 3 and 4 of this Privacy Policy.



5.3 We do not pass on to third parties the personal details of those who are included on our mailing lists, unless a legal requirement arises to do so.

6. AGM, EXTRAORDINARY MEETINGS, COMMITTEE MEETINGS, SUB-GROUP MEETINGS, OTHER MEETINGS

6.1 York Pride maintains records of its meetings so that its deliberations and decisions are recorded for future reference and legal reasons.

6.2 Records of open meetings (i.e. those meetings that anyone can attend) may show who attended and who made specific points and comments. Occasions may arise where such records are publicly disclosed. Attendees may not wish for their name to appear in publicly released versions of such records (either in whole or part of the record) and where an individual has expressly requested that their details are not released in public versions, the name of that individual shall be redacted before the record is released. The official record held by York Pride will show the name of the individual; the official version will be circulated within York Pride and only be released outside of York Pride if a legal requirement arises to do so. Where the record of an open meeting is to show the names of those attending and those who speak, to ensure consent of someone attending who is not a York Pride official, the chair of each such open meeting shall make the following statement at commencement of proceedings:

“This is an open meeting of York Pride and the official record of this meeting will show all who attended and the name of anyone who speaks. Any individual present who does not wish their personal details to be shown in a public published version of the record must advise the chair of this meeting prior to conclusion of this meeting.”

6.3 Records made by York Pride of closed meetings held internally and with sponsors, partners and third parties which are to be disclosed to others not involved in the meeting or are not Pride Officers will be subject to redaction of personal information before disclosure.

7. PHOTOGRAPHS

7.1 York Pride uses photographs to record its activities for publicity purposes and as historical record of our events.

7.2 Photographs taken in open forums including the Parade, Festival, events and open meetings by York Pride or obtained from third parties where no names are attributed to individuals in the photograph are subject to use without consent of those individuals in the photograph.

7.3 Photographs taken in closed events or where names are to be used to identify individuals in a photograph will be subject to the consent of those individuals.

8. YORK PRIDE DATA PROTECTION REGISTER

8.1 A register shall be maintained of all personal data held by York Pride. Records will be kept of what personal information of individuals is given to: Pride Officials to hold for specific business purposes and the date it is no longer required for the purpose it was obtained and is destroyed; and to third parties for the authorised reasons stated above who shall become data owners of that information once transferred.



9. DATA CONTROLLER, SENIOR INFORMATION RISK OWNER, INFORMATION ASSET OWNERS²

9.1 The Data Controller for York Pride is **Greg Stephenson** in capacity as Chair of York Pride.

9.2 The Senior Information Risk Owner is **David Millar** in capacity as Data Protection Officer for York Pride.

9.3 The Information Asset Owners are:

Records of York Pride Trustees, 'Named Officers', Support Officers and Ambassadors	Greg Stephenson, Chair
Records of other York Pride Volunteers	Martin Patterson, Volunteer Director
Records relating to Schools, Colleges and Youth Groups	Jen Phoenix, Schools Liaison Officer
Records relating to Sponsors	Greg Stephenson, Sponsorship Officer
Records relating to 'Wristband Scheme' supporters and sellers	Jen Phoenix, Wristband Scheme Co-ordinator
Records relating to registered Parade Groups and contractors/third parties supporting the Parade	David Millar, Parade Director
Records relating to Stall Holders and contractors/third parties supporting the Festival	Will Bosanquet, Festival Logistics Director

10. DATA BREACH

10.1 If we become aware of a data breach under the DPA 2018 we shall undertake a full investigation to identify the cause and apply remedial action to prevent a reoccurrence. Where that breach is likely to result in the risk to the rights and freedoms of an individual (e.g. results in discrimination, damage to reputation, financial loss, loss of confidentiality or other significant social disadvantage) we shall notify the Information Commissioner's Office. Where a breach is likely to result in a high risk to the rights and freedoms of an individual we shall in addition notify the individual.

11. SUBJECT ACCESS REQUEST

11.1 An individual may request details of their personal information held by York Pride by writing to chair@yorkpride.org.uk. The individual will receive confirmation of receipt of the Subject Access Request (SAR) from York Pride within 5 days. A response will be provided within 30 days of receipt of the request.

12. COMPLAINTS TO INFORMATION COMMISSIONER

12.1 York Pride does not meet the minimum statutory requirement for mandatory registration with the Information Commissioner's Office (ICO) and has not voluntarily registered with the ICO.

12.2 Although not registered with the ICO as an Information Asset Owner, York Pride is still legally required to comply with the DPA 2018. An individual who has concerns about how we handle their personal information or is not satisfied with the outcome of a SAR raised under paragraph 11 above can raise the matter to the ICO by following the direction on the ICO web site at <https://ico.org.uk/make-a-complaint/>. Individuals can also obtain advice (Monday to Friday 0900hrs to 1630hrs) by chatting with an ICO adviser online through the ICO web site or from the ICO helpline by calling 0303 123 1113 or textphone 01625 545 860. The address of the ICO is: Information Commissioner's Office, Wycliffe House Water Lane, Wilmslow, Cheshire SK9 5AF.

² Subject to review/updating after each AGM or change of York Pride official. Last Updated 31 March 2022.

