

## Introduction

### PRIVACY POLICY

This privacy policy sets out how Happy Day's Children Charity Limited (**Happy Days**) uses and protects your personal data. This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can view the full version of the privacy policy here:

[www.happydayscharity.org/gdpr](http://www.happydayscharity.org/gdpr)

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## 1. Important information and who we are

### Privacy policy

This privacy policy gives you information about how Happy Day's Childrens Charity (registration number 02639512) of Unit 6&7 The Glover Centre, 23-25 Bury Mead Road, Hitchin SG5 1RP collects and uses your personal data through your use of this website, including any data you may provide when you sign up to our ENewsletter, use our services or support Happy Days through sponsorship or donations. It also confirms how we may use personal data of our service users, including photographs.

This website is not intended for children but we do process children's data in connection with our services. References in this privacy policy to "you" include children to whom we provide services and whose consent may be provided by their parent and/ or lawful guardian.

### Controller

Happy Days is the controller and responsible for your personal data (collectively referred to as "Happy Days", "we", "us" or "our" in this privacy policy).

We have appointed a data compliance officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 9), please contact the Ryan Sinclair using the information set out in the contact details section (paragraph 10).

## 2. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, home address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of and services we have provided to you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes services requested by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you interact with and use our website and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service offering.

### 3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by filling in forms (online or otherwise) or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our services;
  - request marketing to be sent to you;
  - offer to sponsor or make donations in connection with our services; or
  - give us feedback or contact us.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
  - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services.
  - Identity and Contact Data is collected from data brokers or aggregators.
  - Identity and Contact Data is collected from publicly available sources such as Companies House.

### 4. How we use your personal data

#### Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** Where we need to perform the contract we are about to enter into or have entered into with you. This includes where you request our services as a trip beneficiary.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example when we write to individuals at their business address in order to provide information about our services and/ or to request sponsorship and donations. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.
- **Consent:** We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose, for example if you subscribe to an email newsletter.

## Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis and retention period
To register you as an actual or potential user of our services	(a) Identity (b) Contact	Performance of a contract with you  We will retain this data for 7 years unless we have a legal obligation to retain it for longer
To process and deliver services to you or in order to process donations which you have made in supporting our services including managing payments, fees and charges	(a) Identity (b) Contact (c) Financial (d) Transaction	Performance of a contract with you  We will retain this data for 7 years unless we have a legal obligation to retain it for longer
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints and queries	(a) Identity (b) Contact (c) Profile (d) Marketing Communications and	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)  We will retain this data for 7 years unless we have a legal obligation to retain it for longer
To seek to connect with your business organisation to provide information about our services and/ or to request sponsorship and donations	(a) Identity (b) Contact	(a) Necessary for our legitimate interests (to seek new donors and sponsorship)  We will retain this data for 7 years unless we have a legal obligation to retain it for longer
To send you relevant marketing communications and make personalised suggestions and recommendations to you about services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Opt-in consent which you may withdraw at any time  We will retain this data for 1 year unless we have a legal obligation to retain it for longer
To use your details including photograph internally within Happy Days and/ or within our donor organisations and/ or in our	(a) Identity (b) Profile	Opt-in consent which you may withdraw at any time

publicity (including on our website and/ or in our social media)		We will retain this data for 7 years unless we have a legal obligation to retain it for longer
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## **Direct marketing**

You will receive marketing communications from us (and from the Brevo platform) only if you have requested information from us and you have not subsequently opted out of receiving the marketing.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view which, services and offers may be of interest to you so that we can then send you relevant marketing communications.

## **Third-party marketing**

We will get never share your personal data with any third party for their own direct marketing purposes.

## **Opting out of marketing**

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us using the information set out in the contact details section (paragraph 10).

If you opt out of receiving marketing communications, you may still receive service-related communications that are essential for administrative or customer service purposes (for example details relating to a trip which we are providing to you, confirmation of donations made, updates to our Terms and Conditions, checking that your contact details are correct etc).

## **5. Disclosures of your personal data**

We will only share your personal data with other parties where necessary and where we have informed you about the identity of the third party and the reason why it is necessary to share personal data with them.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## **6. International transfers**

We do not transfer your personal data outside the UK.

## **7. Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to

know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

## **8. Data retention**

### **How long will you use my personal data for?**

Details of retention periods for different aspects of your personal data are set out in the table above.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our service users (including Contact, Identity, Financial and Transaction Data) for six years after they cease being service users for tax purposes and our retention policy reflects a general expectation that it is in everyone's best interests for such information to be deleted after seven years.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

## **9. Your legal rights**

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- Request access to your personal data (commonly known as a "subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data in certain circumstances. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling

based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.

- You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes (see **OPTING OUT OF MARKETING** in paragraph 4 for details of how to object to receiving direct marketing communications).
- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data (see the table in section 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
  - If you want us to establish the data's accuracy;
  - Where our use of the data is unlawful but you do not want us to erase it;
  - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact Ryan Sinclair using the information set out in the contact details section (paragraph 10).

### **No fee usually required**

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure

that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### **Time limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **10. Contact details**

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact Ryan Sinclair in any of the following ways:

- Email address: [enquiries@happydayscharity.org](mailto:enquiries@happydayscharity.org)
- Postal address: Unit 6&7 The Glover Centre, 23-25 Bury Mead Road, Hitchin SG5 1RP
- Telephone number: 01462 530710

### **11. Complaints**

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### **12. Changes to the privacy policy and your duty to inform us of changes**

We keep our privacy policy under regular review. This version was last updated on 26.06.2025

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

### **13. Third-party links**

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.