Privacy Notice
Beneficiaries and volunteers

Reviewed and adopted by the Board of Trustees: 24th September 2025
Next Review Date: Q3 2026

Published Construction Youth Trust General Privacy Notice

1. **We are committed to protecting your personal information**

Construction Youth Trust is committed to respecting and keeping safe any personal information you share with us or that we get from other agencies/organisations.

2. **Making a complaint**

If you have any feedback or would like to make a complaint about how we handle your personal information, please contact us so we can investigate and address your concerns. For how to make a complaint, please see our Complaints Policy.

You also have the right to complain about how we collect and use your personal information to the UK data protection regulator, The Information Commissioner's Office (ICO).

3. **Why we use your personal information**

We will only collect and use your personal information where we have a legal basis to do so and will always respect your rights.

Where we use your information, it may be because you have consented to us doing so or because we consider we have a legitimate interest to do so. Other reasons may include using information because we have a legal obligation to do so or because we have to fulfil contractual obligations.

Examples of why we use your personal information include:

- You have given us your explicit consent to use the information for a specified purpose, for example to receive our e-newsletter.
- You have expressed interest in Construction Youth Trust by a positive action, for example by completing a registration form or have taken part in a project or an event.
- We have a legal obligation to use your information, for example to maintain Gift Aid records.
- We also reserve the right to apply our legitimate interest wherever we believe it is appropriate, but we promise that we will never do this in an intrusive way and will always respect your rights and freedoms when doing so. Some examples of when we would rely on our legitimate interest include:
    1. To pursue our organisational aims and objectives
    2. To fundraise (both now and in the future) to fund our work
    3. To ensure we meet our regulatory requirements as a charity
    4. To manage our ongoing relationship with our supporters and anyone we work with
    5. To manage our financial transactions and prevent fraud.

4. **What personal information we collect**

The personal information we collect about you will depend on how and why you are engaging with us. It could include (but is not limited to):

- Your name, address, telephone number, e-mail address, date of birth, school/employer, motivation for supporting the charity and your contact preferences
- Other information you provide to us from time to time which is relevant and necessary for us to collect and process
- As a beneficiary you may also be requested to provide additional information for example emergency contact information, any medical information that you think we should be aware of to facilitate your engagement, gender and ethnicity
- We may also collect information about your activity online when you visit our website and when we send you an email

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent. You are able to remove your consent at any time. You can do this by contacting us on the email address below
(b) We have a contractual obligation
(c) We have a legal obligation
(f) We have a legitimate interest

As part of the registration process to participate in our programme, we may collect and process special category data about you. This includes information about your ethnicity and health. We do this to ensure that our programme is accessible and reaching our target audience.

We will only process this type of data if we have a lawful basis to do so and one of the specific conditions for processing special category data as set out in Article 9 of the GDPR.

We may process special category data for the following purposes:

- To ensure that our programme is accessible and reaching young people from diverse backgrounds
- To monitor and evaluate the effectiveness of our programme in promoting equality and diversity
- To provide you with support that is tailored to your needs and circumstances

We will always ensure that the processing of your special category data is necessary and proportionate to achieve the purposes for which it was collected. We will also ensure that appropriate safeguards are in place to protect your privacy and your rights.

If we need to process special category data about you, we will inform you of the specific lawful basis and condition for processing this type of data, as well as any additional safeguards that may be in place to protect your rights.

Please note that providing this information is entirely voluntary. However, if you choose not to provide this information, we may not be able to provide you with certain services or support that are tailored to your needs and circumstances.

If you shared with us any sensitive information, the information you have provided will be kept by Construction Youth Trust and will be treated with the strictest of confidence. It will not be shared with a third party without your consent unless we have a statutory obligation to do so, or there are concerns for your safety which Construction Youth Trust has a duty to report to the relevant authority in order for appropriate action to be taken.

If you give us personal information about another person, we expect you to be responsible for ensuring that they know we are using their personal information in accordance with this privacy policy and we will make every effort to obtain the necessary conditions for processing that data, for example if it is in our legitimate interest.

5. How we use your personal information

We use your personal information for the following purposes:

- To pursue our organisational goals and charitable objectives of supporting young people in their education, training, and employment aspirations.
- To respond to or fulfil any requests, complaints, or queries we receive from you.
- To confirm that your gift or purchase has been processed correctly, to validate your Gift Aid claim and maintain records of your past and future donations.
- To provide you with information and support for any events, fundraising activities or volunteering opportunities you sign up to.
- To raise funds and to promote the aims and objectives of the charity.
- To manage your contact preferences. If you ever want to change the way we keep in touch, just let us know by emailing hello@constructionyouth.org.uk or calling our team on 020 7467 9540.
- To make better decisions, communicate more efficiently and develop a better understanding of our supporters. This might involve non-intrusive profiling and data segmentation and may encompass using information found in the public domain to understand your likes and preferences better so that our communications with you are as relevant as possible. We do profile your information in this way, but we also uphold your privacy by not sharing the information or the outcome with any third parties. External data sources we use might include publicly available information such as Companies House, Charity Commission and other charity registers, Electoral Roll Register, reputable newspaper articles, publications, company websites and biographies on professional networking sites as well as geographic and demographic information based on your postcode.
    - If you would prefer us not to use your data in this way, please let us know by emailing hello@constructionyouth.org.uk or calling our team on 020 7467 9540

- To create anonymous and aggregated reports about our supporters and the young people we support, to ensure our organisation is communicating with and delivering the best possible information and services.
- To inform our digital and social media marketing. For example, we may use your information to enable us to display adverts to you, or to potential supporters who have similar characteristics to you.
- For our internal purposes such as management, research, analytics, organisational reporting, and ways that will improve efficiencies.
- To prevent and detect criminal activity and fraud.
- To comply with applicable laws, regulations, court orders, government and law enforcement agencies' requests, to operate our systems properly and to protect ourselves, young people we support, our supporters, our employed and funded staff and to solve any customer disputes.
- To help the emergency services if required.
- When volunteering for the Trust, we may share this information with your employer.
- When planning our events we may use this information to make sure the events are planned safely for both us and you.

6. Who we share your personal information with

We never sell any personal information to other charities or organisations. However, there are some circumstances where we would share your data with third parties. For instance:

- If we are legally required to do so, e.g. court order, law enforcement agency pursuing an investigation.
- If we believe it necessary to protect or defend our rights or the personal safety of our personnel or a young person we support.
- If we believe that sharing the information will help/support the welfare and/or education of the young person in question.
- When we work with carefully selected partners, e.g. the company that supplies our payroll services. These partners (called 'data processors') will only have access to your information when the necessary contractual arrangements have been agreed and signed and they will always be obliged to follow the strict General Data Protection Regulation (GDPR) regulations.
- When information has to be sent to HMRC as part of the declaration process for Gift Aid so that we can reclaim the Gift Aid on your donation(s).
- When partnering with another organisation to support you as an individual through our organisation and charitable goals. Some specific common examples this includes (but is not limited to) below:
    - When the facilitation of an event is supported by a third party, they may require that we provide some personal information of the attendee(s) for security purposes (e.g. names, contact information, dietary requirements)
    - When supporting a young person to receive qualifications, the examination board will require that we submit detailed personal information to register the young person (First name, Last name, DoB, Gender, Post code).

- We may share information about your participation on the course with your school/college/referral partner/emergency contact (attendance, qualifications)
- When helping facilitate an employment opportunity with a third party, we may send the employer a copy of your CV and contact details.

7. International transfers of your personal information

The Trust may transfer personal data to internal or third-party recipients located in another country where that country is recognised as having an adequate level of legal protection for the rights and freedoms of the relevant data subjects.

Where transfers need to be made to countries lacking an adequate level of legal protection (i.e. Third Countries), they must be made in compliance with an approved transfer mechanism. The Trust may only transfer personal data where one of the transfer scenarios listed below applies:

- The transfer is necessary for the performance of a contract with the Client.
- The transfer is necessary for the implementation of pre-contractual measures taken in response to the Client's request.
- The transfer is necessary for the conclusion or performance of a contract concluded with a Third-Party in the interest of the Client.
- The transfer is legally required on important public interest grounds.
- The transfer is necessary for the establishment, exercise or defence of legal claims.
- The transfer is necessary to protect the vital interests of the data subject.

8. Keeping your personal information up to date

We will use publicly available sources to ensure that the information we hold is accurate and up to date. For example, where you have signed up for a redirection service, we will use the Post Office's National Change of Address database to keep in touch. We may use other services to cross-check the accuracy of the contact details we hold for you.

9. How long we keep your personal information

The periods for which we keep your information depend on the purpose for which your information was collected. We will not keep your personal information for longer than necessary for the organisation's purposes or for legal requirements.

If you would like to know how long we will hold any specific information, then please refer to our Records Retention policy or contact our data protection officer at dpo@constructionyouth.org.uk and they will provide you with further details.

10. How we protect your personal information

We maintain the highest standards of data privacy and security to protect your personal details and other information about you because we want you to feel completely confident about engaging with us. We regularly review our processes and

procedures to protect your information from unauthorised access and use, accidental loss and/or destruction.

Sometimes we use other organisations (known as 'data processors') to process your personal information on our behalf. We don't allow them to use this information for their own purposes and they have to follow our strict instructions whilst complying with appropriate security measures. We constantly assess their security measures when we bring them on board, and we continue to monitor their compliance throughout the time we use their services.

11. Your Rights

You have the following rights in relation to your personal data under GDPR:

- The right to access your personal data
- The right to rectify any inaccurate or incomplete personal data
- The right to erasure of your personal data (also known as the "right to be forgotten")
- The right to restrict processing of your personal data
- The right to data portability
- The right to object to processing of your personal data
- The right to withdraw your consent (if processing is based on your consent)

If you wish to exercise any of these rights, please contact us using the details provided below.

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of automated decision-making and profiling. The Trust does not carry out any automated decision-making and/or profiling on the workforce.

12. Collecting data through our Website and Cookies

Please refer to our Website & Cookies Policy.

13. Changes to our privacy policy

We may update this policy to reflect changes in how we use your information. Any changes to our privacy policy will be posted on our website for you to review**.** Where appropriate, we will provide you with notice of any significant changes to how we use your information.

14. Contacting us

If you have any questions about this privacy policy and how we use your personal information, please get in touch by emailing dpo@constructionyouth.org.uk, calling our team on 020 7467 9540 or writing to us at:

London Scottish House London,
95 Horseferry Road, SW1P 2DX