



**Yes Futures**

## **Data Protection Policy**

**Schools, teachers, students,  
parents and guardians**

**Prepared by Yes Futures  
[www.yesfutures.org](http://www.yesfutures.org)**

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## About this Policy

This policy explains in detail the types of personal data we collect, how and why we use it, who we disclose it to, and how we protect the privacy of individuals associated with Yes Futures.

As an independent charity, Yes Futures takes full legal responsibility for the running of the Yes Futures programmes. As such, we take seriously the need for privacy and protection of the data which is provided to us. This includes personal data about students, teachers and parents/guardians, which we need to process in order to effectively run our programmes. This policy defines our processes for what data is collected, the nature and purposes of processing, how data is stored and protected and how breaches are reported.

This policy will be made available to all partner schools as well as teachers, students and parents and guardians associated with a Yes Futures programme. It acts as a **Data Processing Agreement** with these parties.

## Introduction

### Who are we?

Yes Futures is a registered charity in England and Wales. We empower young people to develop confidence, resilience and key life skills through extra-curricular success.

Registered Charity Number: 1155082

Website: [www.yesfutures.org](http://www.yesfutures.org)

Phone number: 02081 444 393

Head Office: 3Space, Keeton's Road, Bermondsey, London, SE16 4EE

Registered office address: 147 Ellerton Road, Surrey, KT6 7UB

### Registration with the ICO

Yes Futures registered with the ICO on 15th February 2017.

Organisation name: Yes Futures

Registration reference: A8166193

Security number: CSN2313089

Our Data Protection Officer (DPO) is: Sarah Wallbank, Chief Executive.

### What is personal data?

As a charity within the education sector, Yes Futures processes personal data. By 'personal data', we mean information that relates to students, parents and teachers within our partner schools and allows us to identify these individuals.

Any information that can directly or indirectly identify a natural person, in any format, is considered personal data:

*"Personal data is any information relating to an identifiable individual, whether it related to his or her private, professional or public life". It can be anything from a name, a home address, a photo. An email address, bank details, posts on social networking website, medical information or a computers IP address'.*  
– The European Commission.

Personal data that has been pseudonymised can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

The definition allows for a wide range of personal identifiers to constitute personal data such as:

- Basic identity information such as name, address and ID numbers
- Email Address
- Web data such as location, IP address, Online behaviour (cookie data) and RFID tags
- Profiling and Analytics data
- Health and genetic data
- Biometric data
- Racial or ethnic data
- Political opinions
- Sexual orientation

### Sensitive personal data

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The GDPR refers to sensitive personal data as 'special categories of personal data'. The regulation now places much stronger controls on the processing of special categories of personal data. The inclusion of genetic and biometric data is new. Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing.

- Race
- Religion
- Political opinions
- Trade union membership
- Sexual orientation
- Health information
- Biometric data
- Genetic data

## Key definitions

- **Data:** Information which a) is being processed by means of equipment operating automatically in response to instructions given for that purpose, b) is recorded with the intention that it should be processed by means of such equipment, c) is recorded as part of a relevant filing system, d) does not fall within paragraph a), b) or, c) but forms part of an accessible record, e) is recorded information held by a public authority.
- **Data Subject/Natural Person:** A living person.
- **Data Controller:** An organisation that decides what is done with personal data.
- **Data Processor:** An organisation that processes personal data on behalf of the Controller. Only follows instructions.
- **Processing:** In relation to personal information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data (e.g. view, open, access, collect or modify), including: a) organisation, adaptation or alteration of the information or data, b) retrieval, consultation or use of the information or data, c) disclosure of the information or data by transmission, dissemination or otherwise making available, or d) alignment, combination, blocking, erasure or destruction of the information or data.

## About the GDPR 2018

### What is the GDPR?

The General Data Protection Regulation (GDPR) is a regulation in EU law on data protection and privacy for all individuals within the European Union. It addresses the export of personal data outside the EU. When the GDPR took effect on the 25th May 2018, it replaced the 1995 Data Protection Directive. It does not, however, replace other existing laws, including the Privacy Electronic Communications Regulation or the E-Privacy Directive. The provisions are consistent across all 28 EU member states which means that companies have just one standard to meet within the EU.

The proposed regime extends the scope of the EU data protection law to all foreign companies processing data of EU residents and provides a harmonisation of the data protection regulations throughout the EU. The GDPR now applies to any organisation that processes the data of the EU data subject and any processing that occurs in the EU. This means the organisations no longer own the data – the data subject owns their data and as such can make new demands as to what is done with their information.

The GDPR therefore will also bring a new set of 'digital rights' for EU citizens in an age of an increase of the economic value of personal data in the digital economy. It expands the rights of individuals to control how their personal information is collected and processed and places a range of new obligations on organisations to be more accountable for data protection.

For more information on our use and protection of digital information, for example website cookies, please see our Cyber Security Policy.

### Why does it exist?

The GDPR aims primarily to give control back to citizens and residents over their personal data and to simplify the regulatory environment for international business by unifying the regulation within the EU.

The Data Protection Directive, which the GDPR aims to replace, went into effect in 1995, well before the internet became an online business hub. Consequently, the directive is outdated and does not address many ways in which data is stored, collected and transferred. The core themes remain largely the same, however, there has been a significant raising of the bar for lawful processing and a new principle of accountability has been added to address concerns over data protection and privacy.

The main things that are expected to come from the GDPR:

- It serves as a regulation for the exportation of personal data of EU citizens outside of the EU;
- It aims to protect EU citizens and residents from data and privacy breaches, giving strict control of personal data to EU citizens;
- It bears a provision requiring all businesses to actively protect the personal data and privacy of EU citizens inside EU member states.

### Who does it affect?

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The new law is applicable to all citizens of the EU and is equally applicable in terms of enforcement to both EU and non-EU companies. The GDPR applies to all EU organisations – whether commercial business, charity or public authority. Organisations must also inform customers of their rights under the GDPR.

### Key changes and notable elements of GDPR

- The definition of personal data is broader and includes IP addresses and online identifiers including email.
- Significant enhancement of Information rights, including right to seek compensation, right to erase and right to know what is processed about you free of charge in 30 days
- Requirements for a more in-depth documentation about what personal data you process and why
- Mandatory requirement to notify the ICO and data subjects of serious data breaches within 72 hours of becoming aware of the breach
- Enhanced restrictions on international data transfers outside of the EEA
- Data processors share responsibility for protecting personal data which must be done via contract
- There are new requirements for data portability
- Systems must be built on the principle of privacy by design and default

### Data protection principles

The GDPR states that personal data must be processed according to the six data protection principles:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation the purpose(s)
- Accurate and where necessary kept up to date
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purpose(s) for which the data are processed
- Processed in a manner that ensures appropriate security of the personal data, using appropriate technical and organizational measures.

## Lawful processing

The law on data protection sets out a number of different reasons for which a company may collect and process personal data, including:

- Direct consent from the individual;
- The necessity to perform a contract;
- Protecting the vital interests of the individual;
- The legal obligations of the organisation;
- Necessity for the public interest; and
- The legitimate interests of the organisation.

### Explaining the legal bases we rely on

- (a) **Consent:** the individual has given clear consent to process their personal data for a specific purpose. In specific situations, we can collect and process data with individual's consent. For example, we request parental consent to use photographs/videos of students on the Yes Futures programmes.
- (b) **Contract:** the processing is necessary for a contract or because specific steps must be taken before entering into a contract. In certain circumstances, we need personal data to comply with our contractual obligations. For example, if a school wants us to run a programme for their students, we will collect personal details of teachers in order to send programme setup information.
- (c) **Legal obligation:** the processing is necessary to comply with the law (not including contractual obligations). If the law requires it, we may need to collect and process personal data without consent. For example, we may need to pass on details of people involved in fraud or other criminal activity to law enforcement. We may also have to pass data to regulatory or governing bodies. In addition, we may need to use individual's data to send communications required by law, for example, updates to our Data Protection Policy.
- (d) **Legitimate interests:** the processing is necessary for legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. In specific situations, we require personal data to pursue our legitimate interests in a way which might reasonably be expected as part of running the Yes Futures charity and which does not materially impact individuals' rights, freedom or interests. For example, we may use teacher's details after a programme to offer them further programmes and funding we have available which would benefit their students. When we process personal data for our legitimate interests, we consider and balance any potential impact on individuals and their rights under data protection and any other relevant law. Our legitimate business interests do not automatically override individuals' interests; we will not use personal data for activities where our interests are overridden by the impact on an individual (unless we have consent or are otherwise required or permitted to by law).

## What personal data we collect

In order to effectively run our programmes, Yes Futures needs to collect a range of personal data, including special category data. We only collect data which is necessary to run our programmes ('performance of service') and to keep individuals safe while in our care.

### Who we collect data from and why

Yes Futures holds direct relationships with children, parents/guardians, teachers and schools and we collect data from all these sources. When collecting personal data, we always make clear for what purpose we will process the data. NB. The data type is assumed to be of the child unless specified otherwise.

Source of data	Type of data collected	Reason
Children	Name Photographs/videos	We collect specific opt-in consent from parents on the Parental Consent Form to use students' photographs/videos. These are taken to share the students' experiences with students, parents and schools at the end of the programme. We also may use some photographs publicly for marketing purposes, for example, on our website or in our programme brochures.
Parents/guardians	Name Date of birth Gender Allergy information Dietary needs Religious needs Special needs Health/medication information Primary emergency contacts' name, phone number and relationship to child Secondary emergency contacts' name, phone number and relationship to child Parent/Guardian's full name Parent/Guardian's telephone number Parent/Guardian's email address	All of this data is collected on the Parental Consent Form. Details of the students needs, as well as emergency contact details, are necessary in order to keep children safe whilst on our programmes. We also ask parents for their name and contact details in order to provide updates to them on the programme delivery details and their child's progress throughout the programme.
Teachers	Teacher's name Teacher's role Teacher's email address Teacher's phone number	A teacher's name, role and contact details are collected on the School Agreement, completed by the school at the beginning of the programme. We need to be able to communicate with teachers for

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	<p>Teacher's health information</p> <p>Teacher's dietary needs</p> <p>Teacher's emergency contact details</p> <p>Teacher's DBS details</p>	<p>administrative or operational reasons, for example, to send the details of a trip day.</p> <p>Details of a teacher's health, dietary needs, emergency contact details are only collected if a teacher is attending a trip with us. These are collected directly from the teacher, usually by email, and are collected in order to keep teachers safe whilst on trips with us.</p> <p>To keep students from other schools safe whilst on our residential, we need to collect teacher's DBS details. These are only collected where the teacher will have contact with students from other Yes Futures partner schools.</p>
School	<p>Name</p> <p>Gender</p> <p>Year Group</p> <p>Date of Birth</p> <p>Home contact person</p> <p>Home phone number</p> <p>Home address</p> <p>Ethnicity</p> <p>Pupil Premium status</p> <p>EAL status</p> <p>SEND status</p> <p>Attendance data</p> <p>Academic data</p>	<p>All of this data is collected on the Student List spreadsheet, completed by schools at the beginning of the programme. The Student List is stored in a secure Google Drive file, only accessible by the Yes Futures team and named teachers.</p> <p>We collect this data to ensure we can plan for individual students' needs in order to run our programmes effectively.</p> <p>We collect the school's record of the student's home contact person, phone number and address, in order to communicate with parents before we have received the Parental Consent Form back. This data is also helpful in cross-checking where we have data missing on parent/guardian details.</p> <p>Ethnicity, Pupil Premium, EAL, SEND, attendance and academic data are indicators that we track to learn more about the impact of our programmes on specific groups of young people. Students are never named individually within these analyses.</p> <p>NB. It is the school's obligation to inform parents/ guardians of the data they are passing on.</p>

## How we protect your personal data

We are committed to taking appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

As described below, we may in some instances disclose personal data to third parties. Where Yes Futures discloses personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data.

In some instances we may be compelled by law to disclose personal data to a third party, such as law enforcement, regulatory bodies or governing bodies, and have limited control over how it is protected by that party.

## Special Category Data

When collecting data on individuals, we may collect information that could reveal racial or ethnic origin, details of physical or mental health (including SEND), or religious beliefs. For example, information about specific dietary requirements could indicate specific religious beliefs. If a request is made for special assistance, use of an adapted room or facilities, or medical needs, this could reveal information about health.

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This information is considered ‘sensitive personal data’ under GDPR and other data protection laws. We only collect this information where it is necessary to deliver our services. We may need to share this data with our suppliers who provide services on our behalf. For example, to a coach hire company if we need an adapted coach to accommodate wheelchair users.

By providing any sensitive personal data to us, you explicitly agree that we may collect and use it in order to provide our services and in accordance with this Data Protection Policy. If you do not allow us to process any sensitive personal data, this may mean we are unable to provide all or parts of the services you have requested from us.

### How long do we keep personal data?

Whenever we collect or process personal data, we only keep it for as long as necessary for the purpose which it was collected.

At the end of the period given below, all personal data is either deleted or anonymised, for example by aggregation with other data, so it can be used in a non-identifiable way for our impact analysis or planning purposes.

Type of data collected	Storage arrangements	Length of storage
Students’ basic identification details: <ul style="list-style-type: none"> <li>• Name</li> <li>• Gender</li> <li>• Date of birth</li> <li>• Year Group</li> <li>• School</li> </ul>	All basic student data is retained on a secure, confidential database hosted in Google Drive. This is accessible by Yes Futures team members only. For the duration of the programme, nominated teachers within the school also have access to this database.	5 years
Students’ status details: <ul style="list-style-type: none"> <li>• Pupil Premium status</li> <li>• EAL status</li> <li>• SEND status</li> <li>• Attendance data</li> <li>• Academic data</li> <li>• Ethnicity</li> </ul>	As above, this data is retained on a secure, confidential database hosted in Google Drive. This is accessible by Yes Futures team members only. For the duration of the programme, nominated teachers within the school also have access to this database.	2 years
Parent/guardians’ contact details collected from school: <ul style="list-style-type: none"> <li>• Home contact person</li> <li>• Home phone number</li> <li>• Home address</li> </ul>	As above, this data is retained on a secure, confidential database hosted in Google Drive. This is accessible by Yes Futures team members only. For the duration of the programme, nominated teachers within the school also have access to this database.	Until the end of the student’s programme (approximately 1 year).

<p>Parent/guardians' contact details collected from parents:</p> <ul style="list-style-type: none"> <li>• Parent/Guardian's full name</li> <li>• Parent/Guardian's telephone number</li> <li>• Parent/Guardian's email address</li> </ul>	<p>All data from Parental Consent Forms is retained on a secure, confidential database accessible by Yes Futures team members only.</p> <p>The original paper versions of the Parental Consent Forms are stored in a locked cabinet within the Yes Futures office and shredded at the end of the student's programme.</p>	<p>2 years</p>
<p>Students' health and emergency contact details:</p> <ul style="list-style-type: none"> <li>• Allergy information</li> <li>• Dietary needs</li> <li>• Religious needs</li> <li>• Special needs</li> <li>• Health/medication information</li> <li>• Primary emergency contacts' name, phone number and relationship to child</li> <li>• Secondary emergency contacts' name, number and relationship to child</li> </ul>	<p>All student health and emergency contact data is retained on a secure, confidential database accessible by Yes Futures team members only.</p> <p>The original paper versions of the Parental Consent Forms are stored in a locked cabinet within the Yes Futures office and shredded at the end of the student's programme.</p>	<p>Until the end of the student's programme (approximately 1 year).</p>
<p>Photographs/videos of students</p>	<p>All photographs and videos of students are stored in a secure Dropbox folder accessible by Yes Futures team members only.</p> <p>Individuals in photographs are not named alongside their storage.</p> <p>Some photographs and videos may have been used for marketing purposes and will therefore be available publicly, for example on social media sites. We do not have control over their storage policies.</p>	<p>10 years, unless consent is withdrawn sooner</p>
<p>Teacher's contact details:</p> <ul style="list-style-type: none"> <li>• Teacher's name</li> <li>• Teacher's role</li> <li>• Teacher's email address</li> <li>• Teacher's phone number</li> </ul>	<p>Teachers contact details retained on a secure, confidential database accessible by Yes Futures team members only.</p> <p>They are also stored within our email server (see below).</p>	<p>Until the teacher is no longer involved in the programmes.</p>
<p>Teacher's health and emergency contact details:</p> <ul style="list-style-type: none"> <li>• Teacher's health information</li> <li>• Teacher's dietary needs</li> <li>• Teacher's emergency contact details</li> </ul>	<p>All student health and emergency contact data is retained on a secure, confidential database accessible by Yes Futures team members only.</p>	<p>Until the teacher is no longer involved in the programmes.</p>
<p>Teacher's DBS details</p>	<p>Scanned copies of a teacher's DBS are stored in a password protected Dropbox folder for the period they have contact with another school. After this they are securely deleted.</p>	<p>Until the teacher is no longer involved in events with other schools.</p>
<p>Email correspondence with schools/teacher/parents/guardians</p>	<p>All email correspondence is stored within our email server: Gmail. Emails are accessible only by</p>	<p>5 years</p>

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	the named individual to whom the email was sent and the Yes Futures Data Protection Officer.	
Impact data (e.g. questionnaires completed by teachers, students and parents, impact reports)	All impact data is collated in a secure Google database file, accessible by Yes Futures team members only. Paper copies of questionnaires are shredded after data has been inputted. Impact reports are stored in a password protected Dropbox folder, accessible by Yes Futures team members only.	10 years
Complaints/issues raised	All data associated with complaints/issues raised is stored in a password protected Dropbox folder, accessible by Yes Futures team members only.	5 years
Incident data (e.g. Accident reports, witness statements)	All incident data is stored in a password protected Dropbox folder, accessible by Yes Futures team members only.	Adults: 5 years Children: 10 years
Insurance claims (e.g. Notification of claim, details of hearings)	All insurance related data is stored in a password protected Dropbox folder, accessible by Yes Futures team members only.	Until claim is resolved or expires

### Note on children's rights

All the students who participate in the Yes Futures programmes are under 16 and therefore classed as children. We need a parent or guardian's consent in order to process their personal data lawfully. The GDPR sets the age when a child can give their own consent to this processing at 16 (although this may be lowered to a minimum of 13 in the UK in the future).

If a child chooses to withdraw consent for data which is not necessary for us to perform our service, e.g. the use of their photograph, we will honour the child's wishes and confirm this with their parent/guardian.

### Sharing personal data

Yes Futures has a number of partners who help deliver our programmes, most notably trip providers. These are partner organisations who provide volunteering days ('Play your Part') and workplace visits ('World of Work') for students on the Yes Futures programmes.

We only share data with our trip providers on a need-to-know basis, to enable them to provide services to us. For example, we may share student dietary needs to ensure there is suitable food available for student lunches. Our trip providers are required to erase all data once a trip has ended.

PGL is the provider of our residential trips. They require the following information on students: name, gender, date of birth, dietary requirements and medical needs, in order to keep them safe during the residential. They delete this data 12 months after travel. For more detail on PGL's Privacy Policy please see: <http://www.pgl.co.uk/en-gb/footer/legals/privacy>

All information that is provided to us is held in our systems, which are located on our premises or those of an appointed third party. We use a number of third party processors who, in virtue of their service, process personal data on our behalf. These include: Dropbox, which hosts our electronic files, Google, which host our email server,

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Wix, which hosts our website and Hootsuite, which hosts our social media accounts. We have checked that all our service providers are GDPR compliant.

When appointing partners, we check that they comply with data protection law and establish a data sharing agreement to ensure the fair and lawful processing of any personal data we share.

Finally, we may need to share personal and medical details of children or adults participating in Yes Futures programmes in the event of any accidents or incidents as part of our duty of care. Again, this will only be on a need-to-know basis to the relevant authorities.

## Your data rights

We respect your right to control your data. Your rights include:

**Right of access** - you have the right to access and obtain a copy of the personal data that we hold about you. Please see specific details below.

**Right to rectification** - you have the right to request that we correct any inaccuracies in the personal data stored about you.

**Right to erasure** - in certain circumstances, you have the right to request that we erase your personal data. For example, you may exercise this right in the following circumstances:

- your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed by us
- where you withdraw consent and no other legal ground permits the processing
- where you object to the processing and there are no overriding legitimate grounds for the processing
- your personal data have been unlawfully processed
- your personal data must be erased for compliance with a legal obligation

Where we store your personal data for statistical purposes, we may not be able to comply with such a request where it would likely impair such statistical purposes or where we require your personal data for compliance with a legal obligation or in connection with legal proceedings.

**Right to restriction** - you have the right to restrict our processing of your personal data where any of the following circumstances apply:

- where you feel that the personal data which we hold about you are not accurate. This restriction will be in place for a period to enable us to verify the accuracy of your personal data
- where the processing is unlawful and you do not want your personal data be erased and request the restriction of its use instead
- where we no longer need to process your personal data (e.g. any of the purposes outlined above have been completed or expire), but we require it in connection with legal proceedings
- where you have objected to our processing of your personal data pending the verification of whether or not our legitimate business interests override your interests, rights and freedoms.

Where you exercise your right to restrict our processing of your personal data, we will only continue to process it with your consent or in connection with legal proceedings or for the protection of the rights of other people or for reasons of important public interest.

**Right to data portability** - you have a right to receive and transfer the personal data that you provide to us in a structured, commonly used and machine-readable format where we process your personal data on the legal bases of: a) your consent; or b) where it is necessary to perform our contract with you. Where you make such a request, we will directly transfer your personal data on your behalf to another controller of your choice (where it is feasible for us to do so).

**Right to withdraw consent** - you have a right to withdraw your consent, at any time, to our processing of your personal data which is based on your consent. Where you exercise this right, our processing of your personal data prior to your withdrawal of consent will remain valid.

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**Right to object to processing** - In certain circumstances, you have a right to object to our processing of your personal data where we process it on the legal bases of our legitimate business interest or your consent to marketing. We may not be able to comply with such a request where we can demonstrate that there are compelling legitimate grounds for us to process your personal data which override your interests, rights and freedoms or where the processing of your personal data is required for compliance with a legal obligation or in connection with legal proceedings.

### Requesting access to your personal data

If you would like to make a personal data access request, please contact the Yes Futures Data Protection Officer, Sarah Wallbank:

Data Protection Officer  
Yes Futures  
Keeton's & Collett (3Space),  
Keeton's Road, Bermondsey,  
London,  
SE16 4EE

Email: [sarah@yesfutures.org](mailto:sarah@yesfutures.org)  
Telephone: 020 81 444 393

You will then be provided with a Data Request Form. You should complete this form if you want us to supply you with a copy of any personal data we hold about you. We can also provide you with information about any processing of your personal data that is being carried out, the retention periods which apply to your personal data and any rights to rectification, erasure or restriction of processing that may exist.

We will endeavour to respond promptly and within one month of the following:

- Our receipt of your written request; or
- Our receipt of any further information we may ask you to provide to enable us to comply with your request.

The information you supply in the Data Request Form will only be used for the purposes of identifying the personal data you are requesting and responding to your request. You are not obligated to complete this form to make a request but doing so will make it easier for us to process your request quickly.

Please note that if the information you request reveals details directly or indirectly about another person we will have to seek the consent of that person before we can let you see that information. In certain circumstances, where disclosure would adversely affect the rights and freedoms of others, we may not be able to disclose the information to you, in which case you will be informed promptly and given full reasons for that decision.

While in most cases we will be happy to provide you with copies of the information you request free of charge, we nevertheless reserve the right in accordance with Article 12 of the GDPR to charge a fee or refuse the request if it is considered to be “manifestly unfounded or excessive”. However we will make every effort to provide you with a satisfactory form of access or summary of information if suitable.

### Data Breach Policy

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Yes Futures has in place a robust and systematic process for responding to any reported data security breach, to ensure it can act responsibly and protect personal data which it holds. This ensures that:

- incidents are dealt with in a timely manner and can be properly investigated
- incidents are recorded and documented
- the impact of the incident is understood, and action is taken to prevent further damage
- the ICO and data subjects are informed as required in more serious cases
- incidents are reviewed, managed and lessons learned

We will notify the ICO of a breach no later than 72 hours after having become aware of it. We will also notify the controller and/or affected individuals without undue delay.

Please see Yes Futures' Data Breach Policy for more information about how we safeguard against data breaches and ensure that any data breaches are appropriately logged and managed in accordance with the GDPR.

### Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113. Or go online to [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns) (please note we can't be responsible for the content of external websites).

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence.

### Updates to our Data Protection Policy

We may make changes to this Data Protection Policy from time to time. You have the right to request the most up-to-date policy statement by contacting our Head Office.

Last Updated: 28<sup>th</sup> February 2020