PRIVACY POLICY

This privacy policy applies between participants of our activities, users of our website and services provided by Lucy Hyde trading as Kith UK. Kith UK takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you.

Please read this privacy policy carefully.

Definitions and interpretation

1. In this privacy policy, the following definitions are used:

Data - collectively all information that you submit to Kith UK via the website or electronic forms. This definition incorporates, where applicable, the definitions provided in the Data Protection Laws;

Data Protection Laws - any applicable law relating to the processing of personal Data, GDPR, and any national implementing laws, regulations and secondary legislation, for as long as the GDPR is effective in the UK;

GDPR - the General Data Protection Regulation (EU) 2016/679;

Lucy Hyde, Kith UK, or **us -** whose trading address is at The Yurt, 3 Hoathly Hill, RH19 4SJ

User or **you -** any third party that accesses the Website or uses our services and is not either (i) employed by Kith UK and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Kith UK

Website - the website that you are currently using, www.kithuk.org, and any sub-domains of this site unless expressly excluded by their own terms and conditions.

2. In this privacy policy, unless the context requires a different interpretation:

a. the singular includes the plural and vice versa;

b. references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy;

c. a reference to a person includes firms, companies, government entities, trusts and partnerships;

d. "including" is understood to mean "including without limitation";

e. reference to any statutory provision includes any modification or amendment of it;

f. the headings and sub-headings do not form part of this privacy policy.

3. Scope of this privacy policy

3.1 This privacy policy applies only to the actions of Kith UK and Users with respect to this Website and our services. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

3.2 For purposes of the applicable Data Protection Laws, Lucy Hyde is the "data controller". This means that Lucy Hyde determines the purposes for which, and the manner in which, your Data is processed.

4. Data collected

We collect personal data about parents, carers, and children who enquire about, register for, or attend our activities.

4.1 Parent and Carer Information

- Full name
- Email address
- Telephone number
- Home address (where provided)
- Relationship to the child
- Emergency contact details

4.2 Child Information

- Full name
- Date of birth and age
- Activity enrolled in or enquiring about
- Trial session dates and attendance records

4.3 Special Category Data (Sensitive Information)

We collect certain sensitive information about children where it is necessary for their safety and wellbeing during activities. This includes:

- **Medical conditions**, e.g. allergies, asthma, any condition that may affect the child during outdoor activities
- **Dietary requirements**
- **Special educational needs (SEN) and disabilities**, to ensure we can provide appropriate support and reasonable adjustments
- **Medication requirements**, where a child needs medication administered during sessions (with written parental consent)
- **Anything we need to know**, where parents share information to help us support their child in the best possible way

This data is classed as "special category data" under the UK GDPR and is subject to additional protections (see Section 4).

4.4 Photographs and Video

With your written consent, we will take photographs or video of children during sessions, these will be shared only with the parent body and not used for publicity, promotional, social media etc See section 6.3 for your right to withdraw from individual and/or group photographs.

4.5 Enquiry and Communication Records

- Enquiry form submissions
- Email correspondence between you and Kith
- Notes from telephone conversations (where relevant to your child/ren)
- WattsApp information where relevant to the activity and your child/ren

5. How We Collect Your Data

Collection Point	***What We Collect***
Terms & Conditions (Google Forms)	Your agreement to the terms and conditions set out for the relevant session/activity
Child Information (Google Forms)	Child's name, DOB, medical conditions, allergies, dietary requirements, SEN information, emergency contacts, photo consent, collected for insurance and safeguarding purposes
Registration of Interest (Google Forms)	Child's first name and date of birth and reasons for considering a Kith UK programme, shared with us to understand more about your child's needs and assess if a place can be offered.
Email correspondence	Information you share with us by email, including any details about your child's needs
Payment Information (Google Forms & Email)	Details confirming payment terms and amount

During sessions	Observations relevant to safeguarding or your child's wellbeing (recorded only where necessary) and photographs and videos to show the activities completed by the children.

6. Why We Collect Your Data and Our Legal Basis

Under the UK GDPR, we must have a lawful basis for processing your personal data.

6.1 Standard Personal Data

Purpose	***Lawful Basis (UK GDPR)***
Responding to your enquiry and arranging trial sessions	**Legitimate interests** (Article 6(1)(f))
Managing you or your child/ren's, attendance, and session records	**Contract** (Article 6(1)(b))
Maintaining financial records	**Contract** (Article 6(1)(b)) and **Legal obligation** (Article 6(1)(c))
Sending session dates, planned activities, and operational communications	**Legitimate interests** (Article 6(1)(f))

Safeguarding and child protection	**Legal obligation** (Article 6(1)(c)) and **Vital interests** (Article 6(1)(d))
Complying with insurance requirements	**Legal obligation** (Article 6(1)(c))

6.2 Special Category Data (Medical, SEN, Health)

Purpose	***Lawful Basis***	***Additional Condition***
Managing Information in a genuine emergency scenario (e.g., disclosing a child's allergy to paramedics if they collapse)	Article 6(1)(d), Vital interests	Article 9(2)(c), Vital interests where the child cannot give consent
Supporting children with SEN or additional needs	Article 6(1)(f), Legitimate interests	Article 9(2)(a), explicit consent
Safeguarding records and referrals	Article 6(1)(c), Legal obligation	Article 9(2)(g), Substantial public interest (safeguarding of children)

6.3 Photographs and Video

Purpose	***Lawful Basis***
Taking and sharing with the parent body photographs or videos of the children enrolled at the sessions via whatsapp. This includes group photographs and videos.	**Consent** (Article 6(1)(a)), we will always obtain your written consent before photographing your child. You may withdraw consent at any time. You may also withdraw your consent to your child being photographed as part of a group. This is in addition to individual pictures.

7. How We Store and Protect Your Data

System	***What Is Stored***	***Security***
Google Workspace (Gmail, Sheets, Drive, Calendar)	Email correspondence, enquiry and registration form responses, T&Cs responses, enrolment records, calendar bookings. Family information collected in the course of operational activities	Google Workspace account with 2-factor authentication, access restricted to authorised staff
Attendance records	Registration of attendance recorded in the register book.	Secure, lockable unit

Paper records (if any)	Safeguarding concern forms, incident reports, accident forms	Secure, lockable unit

We do not store your full card or bank details. We record only that a payment has been made for a child, its amount and its reference. If payment is made in cash, we record its receipt. In the event of having to refund you this will be managed with cash to avoid having to hold bank records.

All electronic data is backed up and access is restricted on a need-to-know basis. We do not transfer your data outside the United Kingdom except where Google Workspace servers may process data in accordance with Google's own data protection commitments and Standard Contractual Clauses. You may find their information here https://policies.google.com/privacy?hl=en-GB

Meta (WhatsApp) — Photos/videos sent to parents via WhatsApp pass through Meta's infrastructure. Meta's role and obligations are set out in WhatsApp's own terms and privacy policy https://www.facebook.com/privacy/policy/?locale=en_GB

8. Who We Share Your Data With

We do not sell your data to any third party. We do not share your data for marketing purposes. We may share your personal data with the following parties, only where necessary:

Recipient	***Purpose***	***Legal Basis***
West Sussex County Council (Children's Social Care / SPOA)	Where we have a safeguarding concern about a child	Legal obligation, safeguarding duty
Police	Where a child is at immediate risk of harm	Legal obligation / vital interests

Local Authority Designated Officer (LADO)	Where an allegation is made against a member of staff	Legal obligation
Our insurers	Where a claim is made	Legal obligation
HMRC	Parent/payment details for tax purposes	Legal obligation
Google (as a data processor)	Google Workspace processes data on our behalf for email, forms, and storage	Contractual, Google acts as our data processor under their Data Processing Agreement
Meta (WhatsApp)	Processes photos/videos sent to parents via WhatsApp on our behalf	Contractual - Meta acts as our data processor under WhatsApp's Business Terms

Safeguarding exception: Under Working Together to Safeguard Children 2023, where there is a safeguarding concern about a child, the duty to share information with relevant authorities overrides normal data protection considerations. We will always act in the best interests of the child.

9. How Long We Keep Your Data

9.1 Unless a longer retention period is required or permitted by law, we will only hold your Data on our systems for the period necessary to fulfill the purposes outlined in this privacy policy or until you request that the Data be deleted:

Data Type	***Retention Period***	***Reason***
Enquiry form submissions (where the family does not proceed)	12 months after last contact	Legitimate interest
Enrolled child's records (contact, session, attendance)	Until 2 years after the child leaves the programme	Contractual and legitimate interest
Financial and payment records	6 years after the end of the financial year in which the transaction occurred	Legal obligation, HMRC and Companies Act
Safeguarding records	Until the child's 25th birthday, or longer if relevant to ongoing proceedings	Legal obligation, statutory guidance (Working Together 2023)
Photographs and video	Deleted when consent is withdrawn, or when no longer needed for the stated purpose	Consent-based

Staff DBS and training records	6 months after employment ends (DBS certificate number and date retained)	Legal obligation and legitimate interest
Email correspondence	3 years after last contact	Legitimate interest, continuity of communication

9.2. Even if we delete your Data, it may persist on backup or archival media for legal, tax or regulatory purposes

We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

10. Data that is collected automatically

To the extent that you access the Website, we will collect your Data automatically, for example:

10.1. We automatically collect some information about your visit to the Website. This information helps us to make improvements to Website content and navigation, and includes your IP address, the date, times and frequency with which you access the Website and the way you use and interact with its content. You will be given the option via the cookie policy to opt in or out of data collection.

10.2 We may use your Data for the above purposes if we deem it necessary to do so for our legitimate interests. If you are not satisfied with this, you have the right to object in certain circumstances (see the section headed "Your rights" below).

10.3. Technical and organisational measures include measures to deal with any suspected data breach. If you suspect any misuse or loss or unauthorised access to your Data, please let us know immediately by contacting us via this e-mail address: hello@kithuk.org

10.4. If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

11. Your rights

You have the following rights in relation to your Data:

11.1. **Right to access** - the right to request (i) copies of the information we hold about you at any time, or (ii) that we modify, update or delete such information. If we provide you with access to the information we hold about you, we will not charge you for this, unless your request is "manifestly unfounded or excessive." Where we are legally permitted to do so, we may refuse your request. If we refuse your request, we will tell you the reasons why.

11.2. **Right to correct** - the right to have your Data rectified if it is inaccurate or incomplete.

11.3. **Right to erase** - the right to request that we delete or remove your Data from our systems.

11.4. **Right to restrict our use of your Data** - the right to "block" us from using your Data or limit the way in which we can use it.

11.5. **Right to data portability** - the right to request that we move, copy or transfer your Data.

11.6. **Right to object** - the right to object to our use of your Data including where we use it for our legitimate interests.

11.7. To make inquiries, exercise any of your rights set out above, or withdraw your consent to the processing of your Data (where consent is our legal basis for processing your Data), please contact us via this e-mail address: admin@kithuk.org

11.8. If you are not satisfied with the way a complaint you make in relation to your Data is handled by us, you may be able to refer your complaint to the relevant data protection authority. For the UK, this is the Information Commissioner's Office (ICO). The ICO's contact details can be found on their website at https://ico.org.uk/.

11.9. It is important that the Data we hold about you is accurate and current. Please keep us informed if your Data changes during the period for which we hold it.

12. General

12.1. You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected.

12.2. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforce-ability of the other provisions of this privacy policy will not be affected.

12.3. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy.

12.4. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

13. Changes to this privacy policy

Kith UK reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and emailed to you if we hold that information and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

For any Data Protection questions or queries you may contact Lucy Hyde by email at admin@kithuk.org

First Published - 08/09/2026