



The Play and Leisure Opportunity Library General Data Protection Regulation Document.

This document works in addition to The Play and Leisure Opportunities Confidentiality Policy to ensure compliance with new GDPR regulations and relates to the collation, storage and processing of all information held.

The Play and Leisure Opportunity Library holds service user data in order to ensure effective delivery of service. All data held by Play Library is provided by service users when undertaking membership to the service. We hold information regarding the service user, their family and the nature of each individuals needs. This information allows us to provide tailored support to families and individuals and ensures that all needs are met, this includes allergy or dietary needs that must be catered for in order to prevent potential injury/incident.

Lawful basis for processing: Play library's basis for storing and processing in line with Article 6 of the GDPR is that we process with **legitimate interest** and for the performance of a **contract** with you (ie, to provide service users with the service they requested receipt of) Email communications: we send out dates for sessions and relevant information to our service users via email, this act is for the benefit of our service users and allows them the option to undertake additional benefits of their library membership should they wish to do so.

"Example 14 – DIRECT MARKETING A charity sends a postal mailshot out to existing supporters providing an update on its activities and details of upcoming events. Note: The GDPR says, 'the processing of Personal Data for direct marketing purposes may be regarded as carried out for a legitimate interest.' An organisation may wish to rely upon Legitimate Interests where Consent is not viable or not preferred and the Balance of Interests condition can be met. The GDPR states "may be regarded as...", so organisations will still need to ensure they can establish necessity and balance their interests with the interests of those receiving the direct marketing communications"

-Data Protection Network, 2018.

Play Library holds only information that is relevant to the service individuals require and is stored securely in line with the guidance set out by the Data Protection Act 1998. Information is held for a period of three years after their membership has expired.

Play Library has strict guidelines regarding information sharing. Express permission must always be sought from the family/individual as needed before sharing any information with any third party. No information will be shared without this permission with the exception of the terms stated within our Child Protection Policy where it may be deemed a child or young person to be in danger.

We recognise that service users have various rights and will ensure these are upheld at every point.

- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object
- Right not to be subjected to automated decision making including profiling

Service users have the right to access any information on request. All requests for information will be processed within 30 days of receipt. The Play and Leisure Opportunity Library reserves the right to refuse a request for information where it is deemed to be excessive or irrelevant. Any refusal will be subject to scrutiny by the Trustees and subsequent decisions will be made in writing.

Service users may rescind consent at any time, we will then take appropriate steps to ensure compliance.