

# Happy Healthy Together CIC

## Data Protection Policy

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### 1. Purpose and scope of this policy

Happy Healthy Together CIC is committed to protecting the privacy and personal data of all individuals we work with, including children, young people, parents, carers, staff, associates and partners. This Data Protection Policy sets out how we collect, use, store and protect personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy applies to all directors, employees, self-employed associates, volunteers and anyone processing personal data on behalf of Happy Healthy Together CIC.

### 2. Our commitment to data protection

Happy Healthy Together CIC is committed to handling personal data fairly, lawfully and transparently. We recognise our responsibilities as a data controller and, in some circumstances, a data processor. We are committed to ensuring that personal data is handled securely, accurately and only for legitimate organisational purposes.

### 3. Types of personal data we process

The personal data we process primarily relates to individuals booking onto or participating in our activities, workshops and programmes. This may include names, contact details, booking information, attendance records and payment-related information where applicable.

In some circumstances, we may also process limited special category data, such as information about health, additional needs or safeguarding concerns, where this is necessary to deliver activities safely and appropriately.

### 4. Lawful bases for processing

Happy Healthy Together CIC processes personal data under one or more lawful bases, including consent, performance of a contract, compliance with a legal obligation, or where processing is necessary for our legitimate interests and does not override individuals' rights.

Special category data is processed only where additional lawful conditions are met, including the provision of appropriate safeguards.

## **5. How we collect data**

Personal data is usually collected directly from individuals through booking forms, registration processes, online platforms or direct communication. We ensure individuals are informed about how their data will be used at the point of collection.

## **6. Data storage and security**

Happy Healthy Together CIC takes appropriate technical and organisational measures to protect personal data against unauthorised access, loss, alteration or disclosure. Data is stored securely, access is restricted to those who need it, and information is retained only for as long as necessary for the purpose for which it was collected.

## **7. Data sharing**

Personal data will not be shared with third parties unless there is a lawful basis to do so. This may include sharing information with delivery partners, booking systems, funders (in anonymised form), or statutory agencies where required for safeguarding or legal reasons. Any sharing is done in line with data protection requirements.

## **8. Individual rights**

Individuals have rights in relation to their personal data, including the right to access, correct, delete or restrict processing of their data, and the right to object to certain uses. Requests relating to data protection rights should be made in writing and will be responded to in line with statutory timescales.

## **9. Data breaches**

Any actual or suspected data breach must be reported immediately to a director. Data breaches will be assessed promptly and, where required, reported to the Information Commissioner's Office (ICO) and affected individuals in accordance with legal requirements.

## **10. Responsibilities**

Happy Healthy Together CIC is responsible for ensuring compliance with data protection legislation. All colleagues must follow this policy, handle data securely, and report any concerns or breaches without delay.

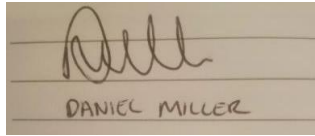
## **11. Relationship to safeguarding**

This policy must be read alongside the Safeguarding Policy. Where a child or vulnerable adult is at risk of harm, safeguarding responsibilities override confidentiality and data protection considerations.

## 12. Policy review

This policy will be reviewed annually, or sooner if there are changes in legislation, organisational practice or technology.

### Director approval



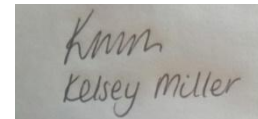
DANIEL MILLER

Signed: Date: 09/04/2026



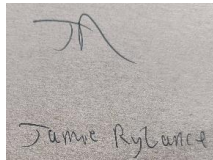
Mr David Trotter

Signed: Date: 09/04/2026



Kmm  
Kelsey Miller

Signed: Date: 09/04/2026



DR  
Dame Ryland

Signed: Date: 09/04/2026