Privacy notice for the Public, Service users and Supporters of The Mix

This covers all the people whom The Mix interacts with who do not fall under another form of agreement

This notice provides information on who we are, how and why we collect, store, use and share personal information. This document contains your rights in relation to your personal information and how to contact us and other organisations in the event if you have a complaint.

Introduction

We are The Mix Stowmarket Ltd. ("The Mix"). In order that we can provide you information about our services and to deliver services to you we need to process your personal information.

Personal information means any information about you from which you can be identified, but it does not include information where your identity has been removed (anonymous data).

As the 'controller' of personal information, we are responsible for how that data is managed. The UK General Data Protection Regulation ("UK GDPR") and the Data Protection Act 2018 (both as amended, including by the Data (Use and Access) Act 2025) set out our obligations to you and your rights in respect of how we manage your personal information.

As the 'controller' of your personal information, we ensure that your personal information we hold is:

- used lawfully, fairly and in a transparent way.
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- relevant to the purposes we have told you about and limited only to those purposes.
- accurate and kept up to date.
- kept only as long as necessary for the purposes we have told you about.
- kept securely.

If you have any questions about this privacy notice or would like further explanation as to how your personal information is managed, then please contact us (see 'How to contact us' below).

Personal data we process

We'll process different personal information depending on the situation.

To provide our services, we collect:

- Name and contact details
- Date of birth
- Address
- Gender
- Emergency contact details / Next of kin details
- Photography and video recordings
- Health and care information (such as medical conditions, allergies, dietary requirements, general care provision)
- Attendance at events
- Payment details including card or bank information for transfers and direct debits

- Website user information
- Information relating to compliments of complaints
- Details of any accidents / incidents that you are involved in
- Youth worker notes and records including
    - Referrer information
    - GP contact information
    - Sexual orientation
    - Religion, Ethnicity
    - Safeguarding records (including concerns, referrals and info about criminal offences)
    - Records of meetings and decisions
    - Information on support requirements, living conditions, lifestyle and interests

We also collect or use special category information to provide services. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information
- Sexual orientation information
- Information about alleged or proven criminal offences, usually only where it forms part of a safeguarding record

For marketing we collect:

- Names, contact details, addresses
- Marketing preferences
- Recorded images, such as photos or videos
- Donation history
- Website and app user journey information
- Records of consent, where appropriate

To receive donations and funding and to organise fundraising activities, we collect:

- Names, contact details, addresses
- Payment or banking details
- Donation history
- Taxpayer information (for Gift Aid purposes)
- Gifts in wills
- Visitors to our online media

For the prevention, detection, investigation and prosecution of crimes, we collect:

- Details of criminal convictions (Disclosure Barring Service, Access NI, Disclosure Scotland)
- Video recordings of public areas (including indoor and outdoor spaces)
- Video recordings of private or staff only areas
- Information relating to health and safety

For recruitment purposes, we collect:

- Names, contact details, addresses
- Date of birth

- National Insurance number
- Copies of passports or other photo ID
- Employment history (e.g. job application, employment references or secondary employment)
- Education history (e.g. qualifications)
- Right to work information
- Details of criminal convictions (Disclosure Barring Service, Access NI, Disclosure Scotland)

For dealing with queries, complaints or claims, we collect:

- Names, contact details, addresses
- Purchase or service history
- Video recordings of public areas
- Video recordings of private or staff only areas
- Witness statements and contact details
- Relevant information from previous investigations
- Customer or client accounts and records
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence

To comply with legal requirements, we collect:

- Names, contact details, addresses
- Identification documents
- Financial transaction information
- Any other personal information required to comply with legal obligations
- Health and safety information
- Safeguarding information

Where we get your information from

We collect most personal information directly from you via registration and booking forms. We may also receive it from:

- Your parent, carer or other family member (for example when they register you for a trip or service)
- People or organisations who refer you to us, such as schools, GPs, health services, children's services or other support agencies
- Schools we work with under partnership agreements
- Our own systems, such as email and website analytics (for example, when you open an email or click a link we send)

Lawful bases and data protection rights

Under UK data protection law, we must have a "lawful basis" for collecting and using your personal information. There is a list of possible lawful bases in the UK GDPR. You can find out more about lawful bases on the ICO's website. Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO's website.

Your right of access

- You have the right for copies of your personal information. You can request information such as details on where we get personal information from and who we share the information with. Some exemptions mean you may not receive all the information you ask for.

Your right to rectification

- You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete

Your right to erasure

- You have the right to ask us to delete your personal information

Your right to restriction of processing

- You have the right to ask us to limit how we can use your personal information

Your right to object to processing

- You have the right to object to the processing of your personal data

Your right to data portability

- You have the right to ask that we transfer the personal information you gave us to another organisation, or to you

Your right to withdraw consent

- When we use consent as our lawful basis you have the right to withdraw your consent at any time

If you make a request, we must respond to you without undue delay and within one month.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information to **provide services and goods, including delivery and third-party referrals** are:

Consent

- We have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract

- We have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation

- We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests

- We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - To use IT and software support providers to ensure the reliable and secure operation of our systems
    - To analyse and improve the effectiveness of our communications
    - To use email and other internal communication systems

Our lawful bases for collecting or using personal information **to receive donations or funding and organise fundraising activities** are:

Consent

- We have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract

- We have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation

- We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests

- We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - To identify and make initial contact with potential funders

Our lawful bases for collecting or using personal information for the **prevention, detection, investigation or prosecution of crimes** are:

Legal obligation

- We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Vital interests

- Collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information for **service updates or marketing purposes** are:

Consent

- We have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Legal obligation

- We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Legitimate interests

- We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
    - To analyse and improve the effectiveness of our communication
    - To use email and other internal communication systems

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

Legal obligation

- We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Our lawful bases for collecting or using personal information for **recruitment purposes** are:
Contract

- We have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal obligation

- We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.

Recognised legitimate interests

- Our pre-approved purpose for collecting or using personal information for recruitment purposes.
- We need to share personal information with a public authority or another organisation because they need it for their public tasks or official functions (the 'public task disclosure response condition').

Our lawful bases for collecting or using personal information for dealing with **queries, complaints or claims** are:

Consent

- We have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Contract

- We have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.

Legal basis for processing

We rely on the following grounds within the UK GDPR:

- Article 6(1)(a) - consent
  - To provide email newsletters to interested parties (unsubscribe link available)
  - To send fundraising and marketing communications by email or text (can withdraw consent)
  - To process special category data where we ask for your explicit consent
- Article 6(1)(b) – processing is necessary for the negotiation or performance of a contract with you
- Article 6(1)(c) - processing is necessary for compliance with a legal obligation to which we are subject.
  - i.e.: health and safety reporting, Gift Aid and tax records, and safeguarding duties
- Article 6(1)(d) – processing necessary to protect vital interests (i.e.: medical emergency)
- Article 6(1)(f) – in pursuit of legitimate interests
  - To use IT support providers to ensure the reliable and secure operation of our systems
  - To identify and make initial contact with potential funders
  - To analyse and improve the effectiveness of our communications
  - To use email and other internal communication systems.
  - To keep our building, visitors, staff and young people safe, including through CCTV
  - To run and record our youth work and support services, where another basis does not apply
  - To record and share safeguarding concerns where appropriate

Which basis applies to which purpose

Purpose	**Basis for personal data (Article 6)**	**Additional basis for special category data (Article 9)**
Group services, trips, events and school partnership work	Contract (paid bookings); legitimate interests (running youth services); consent where we ask for it	Explicit consent (e.g. medical or dietary information for trips); vital interests in an emergency
One-to-one support (coaching and, if offered, counselling)	Consent; or legitimate interests	Explicit consent; health or social care (Article 9(2)(h)) where applicable; DPA 2018 Schedule 1 – counselling and similar confidential support

Safeguarding and child protection	Legal obligation (where one applies); legitimate interests; vital interests in an emergency	Substantial public interest – DPA 2018 Schedule 1 – safeguarding of children and individuals at risk
Financial management (donations and Gift Aid)	Legal obligation (HMRC); legitimate interests	Not applicable
Health and safety, accidents and insurance	Legal obligation; legitimate interests	Legal claims; vital interests in an emergency
Operational activities (database, IT)	Legitimate interests	Not normally applicable
Marketing, fundraising and communications	Consent (email and text marketing); legitimate interests (analysing and improving our communications)	Not applicable
Funding and reporting	Legitimate interests	Explicit consent if identifiable special category data is shared; otherwise anonymised
CCTV	Legitimate interests (safety of people and property)	Not applicable

Special category data

Special category data require additional legal basis. Depending on the situation we rely upon the following:

- Obtaining your explicit consent
- Needing to provide health or social care, or confidential counselling or support
- Protecting a child or adult at risk (the 'substantial public interest' condition for safeguarding in Schedule 1 of the Data Protection Act 2018)
- Protecting someone's vital interests where they cannot consent
- Establishing, exercising or defending legal claims (for example, insurance claims).

Withdrawing consent

Where we rely on your consent, you can withdraw it at any time by contacting us or, for marketing, by using the unsubscribe link. Withdrawing consent does not affect anything we did before you withdrew it.

Who has access to your personal data

To operate our business and deliver our services we rely on third parties to provide specialist support to us. To provide this support they will have access to, or a duty of care over your personal information. These providers are:

- Care providers
- Organisations we need to share information with for safeguarding reasons
- Emergency services
- Legal bodies or authorities
- Local authorities or councils
- Relevant regulatory authorities
- Organisations we're legally obliged to share personal information with

Children and young people

We take extra care with children's information and explain to them how we use it in plain language.

Where we ask for consent, we will also ask a child or young person themselves if they are mature enough to understand what they are agreeing to. We consider each young person individually.

We may collect details about parents, carers and emergency contacts from you or from them. We will share information about a child or young person with their parent or carer where appropriate, taking into account the child or young person's age, understanding and wishes, and their safety.

What children and young people tell us in one-to-one sessions is confidential, except where we believe that they or someone else is at risk of harm. In those cases, we follow our safeguarding policy, which may mean sharing information with children's services, the police or other agencies even if the young person or their family would prefer us not to. We will tell the young person what we are doing wherever it is safe to do so.

Providing your information and automated decisions

You do not have to give us your personal information, but we may not be able to offer some services, trips or events without it. Where we need information to comply with the law (for example Gift Aid declarations or accident reporting), we will tell you when we ask.

We do not make decisions about you using solely automated means, and we do not use your information for profiling that has legal or similarly significant effects.

International transfer

Where necessary, we will transfer personal information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. For further information on the appropriate safeguard for any of the transfers below, please click on the links below

Organisation name:	Quickbooks
Category of recipient:	Financial transactions
Country the personal information is sent to:	USA
How the transfer complies with UK data protection law:	Complies with UK-US Data Privacy Framework

Organisation name:	Mailchimp
Category of recipient:	Marketing
Country the personal information is sent to:	USA
How the transfer complies with UK data protection law:	Complies with UK-US Data Privacy Framework

Retention schedule

Type of data	Retention period
Financial records including donor and gift aid records	6 years
CCTV	30 days unless utilised for any investigations
Service user records	Counselling notes are kept for up to 6 years after the last date of service use, in line with British Association of Counselling and Psychotherapy (BACP) guidance Other general service user records are kept for up to 6 years after the last date of service use
Safeguarding records	6 years after last contact or until the young person is 25
Communications and emails including marketing and consent records	6 years unless you unsubscribe or withdraw consent; we then keep a minimal record so we can honour your choice
Other operational data including accident and incident records, and volunteer and supporter records	6 years

When a retention period ends, we securely delete or anonymise the information. We may keep information for longer where it is needed for legal claims, safeguarding or an inquiry or investigation.

How to complain

We hope that we can resolve any query or concern you raise about our use of your information.
Please contact us first before contacting the ICO. We will respond within 30 days.
The UK GDPR also gives you right to lodge a complaint with the supervisory authority in the UK: the Information Commissioner who may be contacted at:
ICO Head Office
4th Floor, No.3 Circle Square
5 Hawkshaw Street
Manchester
M1 7BL
https://ico.org.uk/concerns/
Telephone 0303 123 1113

Data controller contact details

Data Controller, The Mix Stowmarket Ltd, 127 Ipswich Street, Stowmarket, Suffolk, IP14 1BB
hello@themixstowmarket.co.uk Subject: FAO: Data Controller
01449 745130
ICO registration reference: ZA461947
Charity number: 1149539
Company number: 08010191