

Focus Foundation Privacy Statement

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Focus Foundation is committed to protecting the privacy of your personal information, including the personal data of children who take part in our activities. This Privacy Statement explains what personal data we collect, why we collect it, how long we keep it, who we share it with, and the rights you have. It also sets out the additional protections we apply when we process children's personal data.

Where we say "we", "us" or "our" in this Privacy Statement, we mean Focus Foundation, a Charitable Incorporated Organisation registered in England and Wales (charity number 1194519), whose registered address is Focus House, Ham Road, Shoreham-by-Sea, BN43 6PA. Focus Foundation is the data controller for the personal data described in this statement.

Children's personal data

Some of our activities - including competitions, events, grants and educational programmes - are aimed at or open to children and young people. We take particular care with children's personal data and design these activities with privacy in mind.

When we process the personal data of a child, we apply the following principles:

- We follow the Information Commissioner's Office (ICO) Age Appropriate Design Code (the Children's Code) and treat the best interests of the child as a primary consideration in how we design and run any online service likely to be accessed by children.
- We collect only the minimum personal data we need for the activity, and we do not use children's data for marketing or profiling.
- Where we rely on consent to process a child's personal data, we obtain that consent from a parent or guardian, and we provide a clear, plain-language explanation that a child can understand.
- We complete a Data Protection Impact Assessment (DPIA) before launching any new activity that involves processing children's data at scale or in higher-risk ways, and we keep that assessment under review.
- We set high privacy protections by default and keep children's personal data no longer than is necessary for the activity.

For specific activities, such as a competition, we provide a separate, activity-specific privacy notice (with a child-friendly version where appropriate) that gives the precise detail for that activity. That notice sits alongside this statement.

Your rights in relation to personal data

Under data protection law you have the following rights. Where the personal data relates to a child, these rights are normally exercised by the child's parent or guardian on the child's behalf:

- the right to be informed about how we use your personal data (which this statement and our activity-specific notices are designed to provide);
- the right to request a copy of the personal data we hold about you (a subject access request), and to be told its origin;
- the right to ask us to correct inaccurate or incomplete personal data;

- the right to ask us to erase your personal data in certain circumstances (including where it is no longer needed, or where it has been processed unlawfully);
- the right to ask us to restrict or to object to our processing of your personal data on legitimate grounds. In limited circumstances we may not be able to stop - if so, we will explain why; and
- the right to withdraw consent at any time, where we are relying on consent. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

To exercise any of these rights, or if you have any questions about how we use personal data, please contact our Data Protection Officer using the details in the “Contact us” section below. We will respond within the statutory timeframe (normally one month).

What personal data do we collect and use?

Depending on how you interact with us, we may collect and use the following categories of personal data:

- identification and contact data, such as name, email address, postal address, telephone number and, where relevant, social media handle;
- for children’s activities: the child entrant’s name and age, the name and contact details of their parent or guardian, the child’s creative submission or other content they provide, and details needed to fulfil prizes;
- photographs, video and other media captured at our events, where we have the appropriate consent;
- records of correspondence when you contact us (including emails and notes of calls);
- donation and Gift Aid information where you support us financially; and
- limited technical and usage data when you visit our website (see “Cookies” below).

We do not routinely collect special category data. Where an activity genuinely requires it (for example accessibility needs at an event), we will tell you and obtain explicit consent.

When do we collect personal data?

We collect your personal data when you:

- enter, or enter a child for, one of our competitions or activities;
- attend one of our events;
- make a donation or fundraise for us;
- contact us with a question, request or feedback; or
- visit our website and agree to non-essential cookies.

In most cases you provide personal data to us directly. For children’s activities, the child’s data is normally provided by a parent or guardian, or by a school or group with the appropriate authority and consent.

Why we use your personal data and our lawful basis

Data protection law requires us to have a lawful basis for each processing activity. The table below summarises, on a non-exhaustive basis, what we process, why, and our lawful basis.

Activity	What and why	Lawful basis
Running competitions and activities for children	Entrant and parent/guardian names and contacts, and the entrant's submission, to administer the activity, judge entries, and notify and fulfil prizes.	Performance of a contract (the activity terms) with the parent/guardian, and our legitimate interest in delivering our charitable activities. Parental consent for any element that relies on consent.
Promoting our work using submissions and event media	Using winning/selected submissions, and photographs or video taken at events, to promote the activity and Focus Foundation's charitable objectives.	Separate, specific consent from the parent/guardian (and, where appropriate, the child), which can be withdrawn at any time.
Donations and fundraising	Processing donations, claiming Gift Aid, and thanking and updating supporters.	Performance of a contract, legitimate interests, consent for fundraising marketing, and legal obligation (Gift Aid records).
Enquiries and correspondence	Responding to your questions, requests and feedback.	Legitimate interest in responding to and supporting those who contact us.
Governance and legal compliance	Meeting our legal, regulatory, safeguarding and accounting obligations, and establishing or defending legal claims.	Legal obligation, and legitimate interest in running the charity properly and safely.
Website use	Understanding how our website is used and keeping it secure.	Consent for non-essential cookies; legitimate interest in a secure, working website.

Providing your personal data is voluntary. However, if you do not provide the data we need for an activity (for example, contact details to notify a competition winner), we may not be able to include you in that activity.

How long we keep your personal data

We keep personal data only for as long as we need it for the purpose it was collected, and to meet our legal and regulatory obligations. We apply the following indicative retention periods, which we keep under review in our retention schedule:

- Competition entries and entrant/parent contact details: kept for the duration of the competition and then deleted within 12 months of the competition closing, unless a longer period is needed to fulfil a prize.
- Event photographs and video used for promotion: kept for up to 3 years, or until consent is withdrawn, whichever is sooner.
- Donation and Gift Aid records: kept for at least 6 years to meet HMRC and accounting requirements.
- General enquiries and correspondence: kept for up to 24 months.

Where we no longer need personal data we securely delete it, or anonymise it so it can no longer identify an individual, in which case we may keep the anonymised data for statistical purposes.

How we keep your personal data secure

We apply appropriate technical and organisational security measures to protect personal data against unauthorised access, loss or accidental deletion. These include restricting access to those who need it, applying encryption to data in transit and at rest where appropriate, multi-factor authentication on key systems, ongoing staff awareness training, and supplier due diligence. We keep these measures under regular review.

Cookies

Cookies are small text files placed on your device when you visit our website. They help the site work, remember your preferences and help us understand how the site is used. We only set non-essential cookies (such as analytics cookies) with your consent. Our Cookie Notice provides more detail and lets you manage your choices. We do not use cookies to profile children.

Who we share your personal data with

We do not sell or rent your personal data. We share it only where necessary, and with appropriate safeguards, with:

- Service providers (processors) who help us run our activities - for example competition or event platforms, IT and hosting providers, and prize fulfilment partners. They act only on our instructions under a written contract and must keep your data secure.
- Focus Group, our connected commercial sponsor, only where there is a clear basis to do so (for example a sponsor named in a specific activity), and on the terms set out in the relevant activity notice.
- Regulators, courts, auditors and professional advisers (such as lawyers and accountants), where we are required or permitted to share data, including to meet safeguarding or legal obligations.

Where a winner nominates a charity to receive a donation, we will share only what is necessary to make that donation.

Most of our processing takes place in the UK. If we ever transfer personal data outside the UK, we will ensure an appropriate safeguard (such as UK adequacy regulations or the International Data Transfer Agreement) is in place.

Changes to this Privacy Statement

We may update this Privacy Statement from time to time. Any changes will be published on our website at www.focusfoundation.org.uk and, unless stated otherwise, take effect once posted. Material changes affecting how we use children's data will be communicated clearly.

Contact us and how to complain

Our Data Protection Officer is responsible for overseeing how we handle personal data. You can contact us at:

Data Protection Officer, Focus Foundation

Focus House, Ham Road, Shoreham-by-Sea, West Sussex, BN43 6PA

Email: info@focusfoundation.org.uk

If you are not happy with how we have used your personal data, please contact us first so we can try to put things right. You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Telephone: 0303 123 1113. Website: www.ico.org.uk

Let's connect. Let's grow.