**Make It Happen Club – Privacy Policy**

**Our privacy policy**

Make It Happen Club is based in the United Kingdom with the mission to inspire children’s digital learning. We collect your data to help us achieve our mission, and we consider and respect your privacy rights every step of the way.

We want to be completely open about what we are doing and why.  The purpose of this policy is to explain how the Make It Happen Club collect and use the personal information you provide to us, whether online, via phone, email, in letters, in any other correspondence, or even from other people.

If you are a child under 13, we want you to know that we are particularly committed to protecting the privacy of the young people that engage with us through our competitions, on our website, and hackathons.

We ensure that we use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

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If you have any questions at any time about data privacy at the Make It Happen Club, please contact us at [info@makeithappen.club](mailto:info@makeithappen.club), or write to: Make It Happen Club, Scotland, Glasgow, 31 Gloucester Avenue, G76 7LH.

**1. Who are we**

The Make It Happen Club will, upon registration, be a Scottish Charitable Incorporated Organisation that aims to inspire children’s digital learning.

We will enable pupils and teachers with the resources and skills required to take an active part in creating inspiring digital solutions.

**2. What information we collect about you**

We aim to limit the information we collect about you to only what we think is required for the purpose for which we collect it. We collect your name, school, email address, postal address, and telephone number when you give it to us for various purposes.

When you visit our website, we may collect technical information relating to your use of our website, including your browser type or the Internet Protocol (IP) address used to connect your computer to the internet. For more on this, see section 10, “Information about cookies”.

As the information we collect about you will be stored on our IT infrastructure, it may also be shared with our data processors who provide email, relationship management, anonymous analytics, document management, and storage services to us.

**3. Why we collect that information**

We collect your information:

* When you sign up to participate in any of our activities
* When you become a volunteer
* When you support us by:
  + Signing up to attend or take part in an event
  + Signing up to gift aid
  + Giving us a donation
* When you contribute to research that we undertake
* When you visit our website
* When you sign up to receive our newsletters or blog updates
* For debugging, in the case of your IP address

If you want to understand more about why we collect your data, please contact us at [info@makeithappen.club](mailto:info@makeithappen.club).

**4. How we collect and store that information**

We take appropriate technical and organisational measures to ensure that the information disclosed to us is kept secure, accurate, and up to date, and that it is kept only for as long as is necessary for the purposes for which it is used.

You should be aware that the use of the internet is not entirely secure, and although we will do our best to protect your personal data, we cannot guarantee the security or integrity of any personal information that is transferred from you or to you via the internet. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features such as encryption to try to prevent unauthorised access.

Where any consent has been given by a parent/guardian on behalf of a child under 13, we will make reasonable efforts to verify that this consent was given or authorised by the parent/guardian, taking into consideration available technology.

**5. What we use your information for**

We collect your data on the occasions listed in section 3, “Why we collect that Information”.

We use the information we have collected to deliver to you 1) information and services connected with the mission of the Make IT Happen Club, and 2) any newsletters you subscribe to. We may tell you about opportunities to enter competitions, ask you to participate in surveys, and check how we are doing in our mission.

Where we have asked for your consent, we may use your image in our materials on our website, at events, and for other promotional purposes.

**6. On what legal basis we use your information**

We have a lawful basis for collecting your data as set out in section 3, “Why we collect that Information”, and for using the data for the purposes described in section 5, “What we use your information for”.

Lawful basis may include:

* Where it is within our **legitimate interests**to process your information to further our mission to inspire childrens digital learning. We know that under this basis of processing, we have a heightened responsibility to keep your interests central and to make sure that your rights as a data subject override our legitimate interest.
* Where we need to comply with a **legal obligation**.
* Where processing is necessary for the **performance of a contract**to which you are a party. If you fail to provide this information, we may be unable to perform the contract.
* Where we have **your consent**. If we want to use **your image**for the purposes of our mission, then we will ask you to consent to that use. Very occasionally, we will also process other areas of **sensitive personal data,**but we will always ask for your consent to do this.

**7. Who we share your information with**

We never exchange or sell your information to any third party.

**8. How long we keep your information for**

We keep your information for no longer than is necessary for our purposes, or for any period required by law, for example for compliance with HMRC requirements, if this is longer. What is necessary will depend on the reason for which the information was collected. We are developing a data retention schedule and will share this in due course.

If you have any questions about how long we keep your information, contact us at [info@makeithappen.club](mailto:info@makeithappen.club).

**9. Your rights**

**Right of access**— you have a right to ask us to confirm whether we are processing information about you, and to request access to this information.

**Right to rectification**— you may ask us to rectify information you think is inaccurate, and you may also ask us to remove information which is inaccurate or incomplete.

**Right of portability**— you have a right to obtain your personal data from us and reuse it for your own purposes.

**Right to be forgotten**— you have a right to seek the erasure of your data, for example where it is no longer necessary for us to continue holding or processing your personal data. This right is not absolute, as we may need to continue processing this information to comply with a legal obligation.

**Right to restriction**— you have a right to ask us to restrict our processing of your information if:

* You contest its accuracy and we need to verify whether it is accurate.
* You ask us to restrict use of it instead of deleting it.
* We no longer need the information for the purpose of processing, but you need it to establish or defend legal claims.
* You have objected to processing of your information being necessary for the purposes of our legitimate interests. The restriction would apply while we carry out a balancing act between your rights and our legitimate interests. If you exercise your right to restrict processing, we would still need to process your information for the purpose of exercising or defending legal claims, for the purpose of protecting the rights of another person, or for public interest reasons.

You can always unsubscribe from any mailing list you are included on. You can do so by contacting us at [info@makeithappen.club](mailto:info@makeithappen.club).

We may ask for your help in locating specific information, e.g. confirming your identity. If you would like to exercise any of your rights, please let us know by writing to [info@makeithappen.club](mailto:info@makeithappen.club). We will act in accordance with your instructions as soon as reasonably possible, and there will be no charge.

Our use of your data processed in the UK is regulated by the Information Commissioner. You have a right to report any of your concerns about our use of your data to the Information Commissioner’s Office. You may do so by contacting them on [ico.org.uk/concerns](https://ico.org.uk/concerns/) or by calling their helpline at +44 303 123 1113.

**10. Information about cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them, see our cookie policy.

**11. About changes to our privacy policy**

Any changes we may make to our privacy policy in the future will be posted here and, where appropriate, sent to you by email. Please check the website regularly to see any updates or changes to our privacy policy. By continuing to use our website, you will be deemed to have accepted such changes.

**12. How to contact us about your data**

Data rights are human rights and we are determined to fairly and fully honour yours. You can unsubscribe at any time or just get in touch with any questions, comments, or instructions regarding your information by writing to [info@makeithappen.club](mailto:info@makeithappen.club) or writing to: Make It Happen Club, Scotland, Glasgow, 31 Gloucester Avenue, G76 7LH.