

CHILD ROAD SAFETY PRIVACY NOTICE

Gist Limited - Child Road Safety Privacy Notice

1.0 INTRODUCTION

Our Child Road Safety Scheme was established to reduce and prevent the needless accidents and deaths of young people on the road. We are proud to offer this free-of-charge programme presented by our own employees, working in partnership with Brake, the UK's largest road safety charity.

As part of the Child Road Safety Scheme your child will soon be visited by a team of our presenters, or will be attending one of our sites in line with the arrangements communicated to you by your child's school/club.

Gist Limited is committed to protecting the privacy and security of all personal information processed by Gist Limited in accordance with our obligations under the UK General Data Protection Requirements (GDPR). This privacy notice explains the personal information we process about your child as part of the Child Road Safety Scheme.

2.0 DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept Securely

3.0 WHAT INFORMATION DO WE PROCESS?

As part of the Child Road Safety Scheme we only process general information about your child's school/group and the numbers attending. All personal information regarding the children attending is kept by the relevant school/club and we do not receive individual names or personal information relating to the children attending. If we are told the children's names during the day, they do not get stored anywhere, they are used simply to communicate with the children.

The only personal information we may process about your child is photographs of your child participating in activities at our sites. This is subject to your specific consent to your child participating in such photographs, as set out below.

4.0 WHAT PHOTOGRAPHS MAY BE TAKEN?

We may take photographs of Child Road Safety events, for example photographs of groups of children participating in activities. You can see examples of these photographs on our website at www.gistworld.com.

Where photographs are taken, the arrangements to do so are facilitated and organised centrally by our Communications Team. Photographs will be taken either by an authorised and identifiable member of GIST Limited staff, or an affiliated photographer.

General photographs of our child road safety events will be strictly prohibited unless facilitated and organised centrally by our central Communications team with the relevant school or club's involvement.

Children in photographs will not be named or personally identified in any way (although the name of their school/club may be identifiable if they are wearing school uniform or the school or club agrees to be named in publications).

Whilst these will be general photographs only, these photographs could be considered personal data relating to your child and therefore are covered by the GDPR. As part of our commitment to data protection, we therefore only take photographs of children whose parents have provided specific consent for them to be photographed as set out below.

5.0 HOW DO WE USE AND SHARE PHOTOGRAPHS?

We process these photographs for our internal communications and external marketing and business development purposes. These photographs may be used by Gist Limited in our internal and external communications to publicise the company and in particular, our Child Road Safety Scheme. This may include, for example, publication on our website, on social media, in external communications to our clients or in external publications, such as business magazines or news articles. We process this information in accordance with your specific consent and in line with our legitimate business interests to promote Gist Limited and in particular our Child Road Safety Scheme.

Photographs of your child's participation in the Child Road Safety Scheme may also be provided by your child's school or club to us or shared with us on social media. These images are not saved within Gist Limited but are sometimes re-shared/retweeted by us on social media. We may equally also share photographs with your child's school/club.

6.0 YOUR CONSENT TO PHOTOGRAPHS

Prior to your child attending a Child Road Safety Scheme event at Gist Limited, your child's school or club will contact you to ask for your specific consent to your child participating in general photographs of the event. You will be asked to complete a form for this purpose. You are asked to provide consent on behalf of your child as your child is under the age of 13.

Your child's school or club will be responsible for keeping details of those children who can and cannot be photographed and will notify us on the day of any children whose parents' have not given consent. We will then instruct the photographer to not take any photos with them in shot. We will ensure that they can be unobtrusively identified to ensure that they do not appear in photographs.

If you choose not to provide consent this will of course not have any impact on your child's ability to fully participate and enjoy the activities under our Child Road Safety Scheme.

7.0 YOUR CHILD'S RIGHTS IN CONNECTION WITH THEIR PERSONAL INFORMATION

We will comply with data protection law and all photographs will be processed in accordance with our Data Protection Policy, which is available on our website. We will only retain photographs for as long as necessary to fulfil our legitimate business interests in producing internal communications and using photographs for external marketing purposes. Once no longer needed, we will securely destroy or delete such photographs.

Under certain circumstances, by law your child has the right to:

- Request access to their personal information (commonly known as a "data subject access request").
 - This enables you to receive a copy of the photographs that we hold of your child's participation, and to check that we are lawfully processing them.
- Request the erasure of your child's personal information, in this case any photographs of your child.

- This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.
- Request the restriction of processing of your child's personal information.
 - This enables you to ask us to suspend the processing of personal information about your child.
- Withdraw consent. You have the right to withdraw your consent for the processing of your child's
 photographs any time. Once we have received notification of withdrawal of consent, we will no
 longer process your child's information.

If you want to exercise any of these rights please contact our Data Protection Lead who would be happy to assist with this. Please note that we may need to request specific information from you to help us confirm your identity and ensure your/your child's right to access the information (or to exercise any of your other rights). We may require your child's school or club's assistance to identify those photographs that contain your child.

8.0 DATA PROTECTION LEAD AND RIGHT TO COMPLAIN

8.1 Data Protection Lead

We have appointed a data protection lead (DPL) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPL.

8.2 Right to Complain

Should you wish to make a complaint about our use of your information we would welcome the opportunity to resolve any issues. Notwithstanding this, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO). If you have a complaint about our use of your information, you can contact the Information Commissioner's Office via their website at www.ico.org.uk/concerns or write to them at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

9.0 CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice via your agency when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.