

# **The Wallingford Sports Trust**

## **Policies and procedures**

### **25.1 Data Protection Privacy Notice**

#### **Who we are**

The Wallingford Sports Trust ("The Trust") is a charity with a registration number of 1171574. The Trust is established to promote community participation in healthy recreation at Wallingford Sports Park for the benefit of the residents (young, old and disabled) of Wallingford and surrounding areas in Oxfordshire by the provision for the facilities for playing sports and activities capable of promoting physical health or fitness.

The Trust is a Data Controller for the purposes of Data Protection Law which means it determines how an individual's personal data is processed and for what purposes.

#### **What this policy is for**

This policy is intended to provide information about how the Trust will use (or "process") personal data about individuals including (but not limited to): its trustees, volunteers and employees. This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

The Trust trustees, employees and volunteers are all encouraged to read this Privacy Notice and understand the Trust's obligations to its entire community.

Anyone who volunteers for, or acts on behalf of, the Trust (including service providers) should also be aware of and comply with this Privacy Notice and the Trust's Data Protection policy.

#### **Responsibility for data protection**

The Trust will deal with all your requests and enquiries concerning the Trust's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. Requests and enquiries should be sent to the Trust on [wspmanager@tiscali.co.uk](mailto:wspmanager@tiscali.co.uk).

#### **Why the trust needs to process personal data**

In order to carry out its daily operation, the Trust may process a limited range of personal data about individuals. The uses of personal data will be made in accordance with the Trust's legitimate interests. The Trust expects that the following uses may fall within that category of its (or its community's) "legitimate interests":

- In the course of employment
- Maintaining relationships within the Clubs;
- To maintain our own accounts and records;
- To manage our volunteers;
- To process gift aid applications;

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- To make use of photographic images of Clubs using Trust facilities in promotional material including the website and social media channels.

### **Types of personal data processed by the trust**

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details
- Dates of birth
- National Insurance numbers
- Bank details
- Employment records

### **How the trust collects data**

Generally, the Trust receives personal data from the individual directly but may receive information from an employment agency or a background checker provider.

### **Who has access to personal data and who the trust shares it with**

Personal data collected by the Trust will remain within the Trust, and will be processed by appropriate individuals only in accordance with access protocols.

Some of the Trust's processing activity is carried out on its behalf by third parties such as payroll on Sage. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the Trust's specific directions and will be treated in accordance with the law.

We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

### **How long we keep personal data**

The Trust will retain personal data securely and only in line with how long it is necessary to keep for legitimate and lawful reasons. Please refer to the Trust's Data Retention Policy for details of retention periods.

### **Your rights**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Trust, and in some cases ask for it to be erased or amended or for the Trust to stop processing it, but subject to certain exemptions and limitations. Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should put their request in writing to the Trust at [wspmanager@tiscali.co.uk](mailto:wspmanager@tiscali.co.uk). The Trust

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will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits, which is one month in the case of requests for access to information. The Trust will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the Trust may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it. You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

### **Whose rights?**

The rights under Data Protection Law belong to the individual to whom the data relates.

### **Data accuracy and security**

The Trust will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please keep us informed if your personal information changes during your working relationship with us. An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under the Act). The Trust will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All trustees and employees will be made aware of this policy and their duties under Data Protection Law and receive relevant briefing.

### **Queries and complaints**

Any comments or queries on this policy should be directed to the Trust using the email address: [wspmanager@tiscali.co.uk](mailto:wspmanager@tiscali.co.uk). If an individual believes that the Trust has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the complaints or grievance procedure and should also notify the Chairman. You can also make a referral to, or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the Trust before involving the regulator.