

KINGSBURY SCHOOL SPORTS PARTNERSHIP CIC PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your involvement with us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. a participant at one of our events, CPD sessions, competitions
2. a club member / organisation who utilises one of the school facilities we manage
3. a participant or parent of a child on one of our school / community programmes or initiatives
4. an individual who has contacted us to receive updates about training, events, or volunteer / employment opportunities
5. An individual client (such as a sole trader) or a school / corporate client who utilises our services or has contacted us to purchase our services/products; or (ii) we have contacted you about the services/products we offer.

References to **we**, **our** or **us** in this privacy notice are to **KINGSBURY SCHOOL SPORTS PARTNERSHIP CIC**
Company No: 09156480, **Address:** Erdington Academy, Kingsbury Road, Erdington, B24 8RE

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Chief Executive Officer has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

You may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Details you provide about your experience in sport and your interests in getting further involved in the sport / volunteering in our area;
- any feedback you provide in a survey;
- records of your attendance at any events, competitions or workshops delivered by us or our sports partners;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.

2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- information about your trade union memberships;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of special category personal information about you. In relation to special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;

- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”. We may also collect criminal records information from you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you create an account on our site at <http://kssp.co.uk>, sign up for our newsletter, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you when you attend one of the events or workshops hosted by us or one of our delivery partners and/or activity providers.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
SPECIFIC USER GROUPS		
<u>School / Business contracts</u> To arrange and manage contracts for the provision of services/products	Transaction and payment data, contact details	This is necessary to enable us to properly manage and perform any contract for services and products.
<u>Community Use (facility hire)</u> To ensure clubs are safe & effective and meet minimum standards	Personal and Club information, NGB affiliation, coaching qualifications, DBS, insurance, first aid, safeguarding, policy info, payment information, participant numbers	We have a legitimate interest to ensure we are hiring our facilities to quality assured clubs
<u>Participants on Programmes</u> We will use information about your health, disability status, and age to ensure we can provide suitable activity provision during KSSP programmes meeting health & safety standards, and ensure we can care for a child suitably when we are in loco parentis	personal contact details such as name, title, addresses, medical conditions telephone numbers, and personal email addresses and emergency contact details;	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.

Purpose ALL USER GROUPS	Personal information used	Lawful basis
To manage our relationship with you, including dealing with enquiries made by you	All contact details, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your account with us.
To send you marketing information we think you might find useful or which you have requested from us, including our newsletter and information about our events and any offers from our partners and activity providers relevant to you	Contact details and marketing preferences. Details you provide about your experience in the sport and, your interests in getting further involved in the sport;	Where you have given us your explicit consent to do so
To deal with your queries or complaints	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with the service we provide.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage any account you have with us and in some cases we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To conduct data analytics studies to better understand event attendance and trends within our provision	Records of your attendance at any events hosted by us and/or our delivery partners.	We have a legitimate interest in doing so to ensure that our events continue to improve and are targeted and relevant.
For the purposes of promoting KSSP services, campaigns and events and the work we do as a Community Interest Company	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.

To comply with health and safety requirements	Records of attendance and health and medical information	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To use information about your physical or mental health (including any injuries) or disability status to ensure your health and safety and to assess your fitness to participate in any of the activities or events we host	Health information	<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity, and health information.	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To administer your attendance at any courses, events or programmes you sign up to	All contact details, date of birth, gender, health and medical information	<p>This is necessary to enable us to register you on to and arrange for the effective delivery of our development programmes and events.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To comply with legal obligations, for example, regarding people working with children or vulnerable adults	Information about your criminal convictions and offences	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member of our body or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member of our body. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also

have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you.

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. [You can then let us know at any time that you do not wish to receive marketing messages by completing this form contacting us at admin@ksspcic.co.uk. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you;**
- **Other service providers and advisors:** for example, email marketing specialists, payment processors, professional advisors, data analysis and IT services
- **Our Partners and Activity Providers:** for the purposes of providing you with information on any opportunities, products and services and other commercial benefits provided by our partners where you have **given us permission to do so** and/or for the purposes of arranging any events or workshops you have registered your interest in
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.
- Information that may be relevant to projects that we fund may be retained for longer periods in order to allow us to assess the longer-term impact of our support for sports projects.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through [your online account]. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

9. **STORING YOUR PERSONAL INFORMATION**

All personal data is kept securely in the following way:

- Paper copies are locked filing cabinets.
- Information is stored electronically in the cloud (password protected) or on computer server (hosted at Erdington Academy) which is password protected to relevant KSSP staff.
- Occasionally personal information of participants (such as registration forms) will be removed from the KSSP office if staff are working remotely and require information is to hand for health & safety purposes (eg medical & emergency contact details). Where Special Category Data is collected a Data Protection Impact Assessment (DPIA) is completed.

10. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

11. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

12. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email ceo@ksspcic.co.uk or write to us at Kingsbury School Sports Partnership CIC, Erdington Academy, Kingsbury Road, Erdington, B248RE

Version dated 26 May 2018