

DATA PROTECTION POLICY

1. Introduction

YSF is the Active Partnership for South Yorkshire and West Yorkshire ('we', 'us', 'our').

This policy describes how we use and process personal data about you and your rights to it. Please read this policy carefully.

We may from time to time update this policy. It is recommended that you check this document for any changes that may occur.

We are committed to being transparent about how we collect and use your personal data. The security and management of your data is important to ensure that we can function effectively and successfully for the benefit of you.

In doing so, we will ensure that your privacy is protected through the lawful and appropriate use and handling of your personal information.

The use of all your personal data by YSF is governed by:

- The General Data Protection Regulation (GDPR)
- The UK Data Protection Act 2018 (DPA)
- The Privacy and Electronic Communications Regulations (PECR)

Other relevant policies include the privacy notices which explain fair processing in conjunction with specific areas of work.

If you have a question about this Data Protection Policy or an area of concern about data protection matters, please contact our Data Controller (Data and Insight Manager)

2. Policy Statement

This Policy ensures the Company;

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach.

3. Data protection principles

- We will comply with the six data protection principles defined in article 5 of the GDPR. This means that your data will be;
- processed in a lawful, fair and transparent manner.
- collected only for specific, explicit and limited purposes ('purpose limitation').
- adequate, relevant and not excessive ('data minimisation').

- accurate and kept up-to-date where necessary.
- kept for no longer than necessary ('retention').
- handled with appropriate security and confidentiality.

We are committed to upholding the data protection principles. All personal data under our control must be processed in accordance with these principles.

4.. Lawful processing

All processing of personal data must meet one of the six lawful bases defined in GDPR:

- Where we have the consent of the data subject
- Where it is in our legitimate interests and this is not overridden by the rights and freedoms of the data subject.
- Where necessary to meet a legal obligation.
- Where necessary to fulfil a contract, or pre-contractual obligations.
- Where we are protecting someone's vital interests.
- Where we are fulfilling a public task, or acting under official authority.

Any special category data (sensitive types of personal data as defined in the GDPR) must further be processed only in the line with one of the conditions specified in Article 9(2).

The most appropriate lawful basis will be noted in the Data Processing Register. Where processing is based on consent, you have the option to easily withdraw your consent.

Where electronic direct marketing communications are being sent, you will have the option to opt-out in each communication sent, and this choice should be recognised and adhered to by us.

5. The type of information we collect about you

If you communicate with us, or do business with us it may result in us collecting personal information about you. We will collect, store and use the following types of personal information about you;

- Contact details such as name, address, email and telephone number
- Bank and transaction details about payments to and from you and other details of services or products you have purchased from us
- Information about how you use our website and services
- Where we collect personal information and participant data for a programme that is being delivered please see our participant privacy notice

6. Data minimisation and control

We will regularly review our data collection processes to ensure that personal data collected and processed is kept to a minimum.

We will keep the personal data that we collect, use and share to the minimum amount required to be adequate for its purpose.

We will retain your personal data only for as long as it is necessary to meet its purpose. In the case of sharing personal data with any third party, only the data that is necessary to fulfil the purpose of the work will be disclosed.

7. How we will use your personal information

We will only use your personal data when the law allows us to. Most commonly we will use your data in the following ways;

- Where we need to perform the contract we are about to enter into or have entered into with you
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests
- Where we need to comply with a legal or regulatory obligation
- To understand programme reach

8. Use of third-party data processors

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.

All our third-party processors are required to protect your personal information in line with the GDPR, data protection act and our policies.

9. Rights of data subjects and subject access requests

Under data protection laws, you have certain rights:

- **Right to be informed.** The right to be told how your personal data is used in clear and transparent language.
- **Right of access.** The right to know and have access to the personal data we hold about you.
- **Right to data portability.** The right to receive your data in a common and machine-readable electronic format.
- **Right to be forgotten.** The right to have your personal data erased.
- **Right to rectification.** The right to have your personal data corrected where it is inaccurate or incomplete.
- **Right to object.** The right to complain and to object to processing.
- **Right to purpose limitation.** The right to limit the extent of the processing of your personal data.



- **Rights related to automated decision-making and profiling.** The right not to be subject to decisions without human involvement.

We will uphold your rights under data protection laws and allow you to exercise your rights over the personal data we hold about you. Privacy information will acknowledge these rights and explain how you can exercise them. Most rights are not absolute, and you will be able to exercise them depending on the circumstances, and exemptions may apply in some cases.

Any request in respect of these rights should preferably be made in writing to info@yorkshiresport.org.

There is no fee for facilitating a request and requests that are 'manifestly unfounded or excessive' can be refused.

We will require you to prove their identity if making a subject access request and we will respond to the request within 30 days from the date of the request unless it is particularly complex in which case we will respond in no longer than 90 days.

The Data Controller will ensure that required actions are taken and that the appropriate response is facilitated within the deadline.

Complaints: We take any complaints we receive about the collection and use of personal information very seriously. You can make a complaint any time by contacting us at info@yorkshiresport.org.

If you think our collection or use of personal information is unfair, misleading, or inappropriate or if you have concerns about the security of your personal information you also have the right to make a complaint to the Information Commissioner's Office.