



# Privacy Policy

## **Mission Statement**

SMILE Through Sport CIC is a data controller and as such is responsible for determining the purposes and means whereby it processes personal data.

## **Aims of the Policy Statement**

- To ensure SMILE Through Sport CIC is fully compliant with the requirements of the General Data Protection regulation (GDPR).
- To handle all personal data with care and in a lawful and appropriate way.
- To provide clear guidelines on handling, storing and using any personal data.

## **Privacy Policy Statement**

SMILE Through Sport CIC is committed to full compliance within the requirements of the General Data Protection Regulation ('GDPR') act.

We need to collect and use information about people with whom we engage with in order to carry out our core functions. We regard the lawful and appropriate treatment of personal information as being integral to our operation and to maintaining the confidence of all those with whom we engage. We will endeavour to deal appropriately with all personal information we use. This includes all data recorded and collected whether it is on paper, in electronic records or any other format.

To comply with the six basic principles of GDPR the way we process personal data must be:

1. Fair, lawful and transparent;
2. For a legitimate purpose;
3. Adequate, relevant and limited;
4. Accurate and up to date;
5. Such as to ensure that data is kept only as long as is necessary; and
6. Such as to ensure that it is kept secure.

In carrying out our core functions we engage with a number of parties, including -

- Our staff, directors and volunteers.
- Our individual participants including adults and children.

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To be reviewed July 2019



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- Our organisational partners including schools, colleges and charities.
- Our friends and supporters, both individual and corporate, who we keep in touch with for the benefit of the organisation.

### **What information do we collect?**

We collect and process personal data when you engage with SMILE Through Sport CIC. This may be through attending a session or event, contacting us via email, letter or telephone with a query or question, talking to us at a networking event or contacting us through our website.

The data we may collect can include:

- your name,
- your gender,
- your date of birth,
- your contact details including your home address, email address and phone number,
- your photograph,
- your medical conditions or disability information.

### **How do we use this information, and what is the legal basis for its use?**

We process this personal data for the following purposes:

1. As required by the us to fulfil our core function and pursue our legitimate interests, in particular:
  - we will use your information primarily to ensure your safety at our events and sessions;
  - we will also use your data to communicate information about events and activities;
  - we may use your email address to send a newsletter or email bulletin from time to time;
2. To fulfil a contract, or take steps linked to a contract: this is relevant where you book places in a session or on an event or enter a competition with us. This may include:
  - taking payments;
  - communicating with you;

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- providing and arranging the delivery or other provision of products, prizes or services;
- 3. Where you give us consent:
  - we may send you direct marketing or promotional material by email;
  - we may handle medical or disability information you or your parent/guardian provide to us, to ensure we support you appropriately;
  - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

### **Withdrawing consent or otherwise objecting to direct marketing**

You will always be able to withdraw your consent for us to store and use your personal data. You have an absolute right to opt-out of direct marketing, or any profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

### **Who will we share this data with, where and when?**

We may share your data with third parties where to do so would be consistent with the GDPR principles.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data may also be shared with third party service providers who will process it on our behalf for the purposes identified above. Such third parties might include our funders such as Sport England and any third party providers of data processing services we may use.

### **What rights do you have?**

We are committed to ensuring that any data we process is accurate and up to date. We will be dependent on you to make us aware of any changes to your personal information.

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In certain circumstances you have the following rights in relation to your personal data:

- the **right to be informed** of how we use your data.
- the **right to request access** to see your data.
- the **right to request correction** of your data.
- the **right to request erasure** of your data.
- the **right to object to the inclusion** of information.
- the **right to request the restriction of processing** of your data.
- the **right to portability** of your data.
- the **right to request the transfer** of your data.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have any unresolved concerns, you have the **right to complain** to the Information Commissioner's Office.

While some information listed above must be provided so that we can comply with legal requirements some of the data we ask you to provide is optional. We will let you know when we collect information which data is mandatory, and which is not. While you do not have to give any non-mandatory data to us it may impact the service we are able to provide, for example if you do not provide your medical and disability information we may be unable to safely support you at our sessions.

### **How long will we retain your data?**

Where we process personal data for marketing purposes or with your consent, we process the data for 3 years unless you ask us to stop. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your wishes in future.

Where we process personal data in connection with performing a contract or fulfilling some other legal obligation, we keep the data for 6 years from your last interaction with us.

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We will retain information held in regard to statutory records in line with appropriate statutory requirements or guidance.

### **How do you get in touch with us?**

We hope that we can satisfy any queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch with us at [info@smilethroughsport.com](mailto:info@smilethroughsport.com) or on 01670 457 757.