



PRIVACY NOTICE

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform about of the types of data we process. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data to carry out effective and efficient processes. We keep this data in a file and we also hold the data within our secure computer systems.

Specifically, we hold the following types of data:

- a) personal details such as name, address, phone numbers, email etc.
- b) school name and sibling information
- c) date of birth
- d) your photograph with provided consent
- e) your gender, information of any disability or other medical information
- f) information on race and religion for equality monitoring purposes
- g) Employment data where applicable (DBS, etc.)

C) COLLECTING YOUR DATA

Data is provided by individuals for purposes such as prospective employment, Holiday Club registration, membership, community sport clubs, Swimming clubs, parenting courses and services.

Personal data is kept in files or within the Company's secure IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data to maintain relevant information in relation to employees and to your children attending Clubs, etc.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

- (a) Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
- (b) Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- (c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- (d) Vital interests: the processing is necessary to protect someone's life.
- (e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
- (f) Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)

E) SPECIAL CATEGORIES OF DATA

The Special categories of data that SHARES process is data relating to:

- a) health
- b) religion
- c) age
- d) medical health

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of vital interest

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to accept a child onto one of our events, for example, holiday club and in the case of prospective employees we are unable to offer employment.

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of employment and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during employment. We use criminal conviction data to determine suitability, or continued suitability for the role. We rely on the lawful basis of **Safeguarding Vulnerable Groups Act 2006** and **Keeping Children Safe in Education 2016** to process this data

H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for organising events, administration of website/payment and general administration duties will have access to your data which is relevant to their function.

We also share payroll data with a provider in order to provide payroll services.

All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

We may share your data with third parties to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We do not share your data with bodies outside of the European Economic Area.

I) PROTECTING YOUR DATA

We are committed to ensuring that your information is secure. To prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we process.

J) LINKS TO OTHER WEBSITES

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

K) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of a child's involvement within our clubs/events and during an employee's time with us. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Recommended Retention Period
Child Participation	25 years from point of leaving
Worked with children	termination date plus 25 years
All other staff	termination date plus 6 years

L) AUTOMATED DECISION MAKING

Automated decision-making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely based on automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

M) Your Rights

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. We operate a separate Subject Access Request policy and all such requests will be dealt with accordingly;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as 'rectification';
- d) the right to have data deleted in certain circumstances. This is also known as 'erasure';
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as 'portability';
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

In addition to the above rights, you also have the unrestricted right to withdraw consent, that you have previously provided, to our processing of your data at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact Kimberley Freeman – Admin Manager

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

O) DATA PROTECTION COMPLIANCE

Our appointed compliance Co-Ordinator in respect of our data protection activities is:

__ Kimberley Freeman __
admin@shareslancashire.co.uk _____ 01695 729 897 __