

Charlton Athletic Community Trust Privacy Notice

Introduction

Charlton Athletic Community Trust (CACT) is committed to respecting any data you share with us, keeping it safe and only using it in ways that are legitimate. CACT takes your privacy seriously. The notice outlines the use of personal data under the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Any enquiry regarding the collection and processing of your data should be made in writing to CACT's Data Protection Officer at Charlton Athletic Community Trust, CAFC Training Ground, Sparrows Lane, New Eltham, London, SE9 2JR or email: DataProtectionOfficer@cact.org.uk

Personal Data - What is it

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone, or in conjunction with any other information in the data controller's possession, or likely to come into their possession.

Where we collect information

CACT will collect information about you in a number of ways including when you provide it to us directly by filling in forms, over the telephone, face to face or on our website, including but not limited to when you:

- Enquire about a sign up for access to one of our programmes or activities
- Book a holiday or training course
- Book a Short Break
- Request specific information that requires us to take your details
- Attend an event
- Register with our youth services
- Enter a competition or prize draw
- Make a donation
- Apply for a job with CACT
- Apply for a volunteering opportunity
- Give consent to receive our newsletter or other marketing information
- Give consent for use of your image or photo
- Give consent for us to use your information for evaluation and monitoring purposes
- Hire a pitch

How do we use your personal data?

Where we are delivering services to you, providing you with information about our work or participating in one of our programmes we may ask you for more information. This could include information on your health or the health of the person who you have given permission to use our services for example a young person or adult you may look after.

We use the information you provide to us for the following purposes:

- To provide you with the services, information and products you request
- To register your details for the service or course you have applied for
- To process booking or payment details
- To record and register when you complete an on-line booking on our website
- Process your employment or volunteer application
- To manage our employees, Trustees and volunteers
- Keep you up to date with our work (if you would like us to)
- For evaluation and monitoring purposes
- To tell stories to help us promote our work
- Claim gift aid
- Look into and respond to complaints

We may use the information you give us to create a profile of your interests and preferences. We do this to help us determine whether and in what ways you might be interested in helping us or getting involved in our activities. We may also, with your consent where applicable, promote activities you may be included in on social media platforms and in the form of blogs, newsletters, videos and photos.

What personal data we collect and how we use it

We may collect personal data (including special categories of data where appropriate and, if applicable, with consent) which includes the following:

- Name
- Address
- Email address
- Telephone number
- Date of birth
- Equal Opportunities information including: age, disability, ethnicity, gender, marital status, religion, sexual orientation
- Images which include video/CCTV footage and photograph
- Current activities and interests

Depending on what service, event or activity you are accessing we may also collect information about:

- Your health
- Any special educational needs or disability you tell us about
- Bank or payment details
- Your Gift Aid status
- Previous donations made
- Courses and events booked and attended

How we keep your data safe and who has access to it

CACT will only collect and store the personal data that we need and will store this in line with legislation and CACT's Data Retention Policy.

All personal data that we collect will be stored securely in password protected systems. Only staff whose role requires it will have access to your personal data.

All staff and data processors who have access to your data will regularly undertake data protection training and follow CACT's Data Protection Policy and procedures.

When we collect your personal information, we use strict procedures and security features to prevent unauthorised access. However the transmission of data via the internet or email is not completely secure. As a result, while we try to protect your personal information, CACT cannot guarantee the security of any information you transmit to us and you do so at your own risk.

Sharing your information

CACT complies with its obligations under the GDPR by keeping personal data up to date, by storing and destroying it securely, and by not collecting or retaining excessive amounts of data.

We only process your personal data based on your consent or because we need to use it in order to fulfil a contract with you (e.g. because you have subscribed to our membership, engaged with our services), we have a specified legitimate interest, or we have statutory obligations to share it (e.g. with the local or government authority).

CACT cannot deliver all the services on our own and sometimes we need help from our partners to provide activities and courses. We will never swap or sell your personal data. We may share your information with trusted third parties, for example our Commissioners, as part of our contractual obligations, and our partners who may deliver some of the services on our behalf. CACT will not share identifiable data with our partners without your consent.

When we use a partner to deliver a service on behalf of CACT we make sure that they apply the same protection to your personal data, this includes a legal agreement (sub-contract) that obliges them to only process data on our instructions and in accordance with the law. Our partners include:

- Royal Borough of Greenwich
- London Borough of Bexley
- Oxleas NHS Trust
- Youth partners
- NHS partners

We may also share your data with other support providers that have been sub contracted to provide specialist support by the above services. In all cases there will be written agreements in place to protect your data.

You can find out more information on our partners and who we work with, on our website under 'What we do':

- Youth services: <https://cact.org.uk/youth-services>
- Health services: <https://cact.org.uk/health-improvement>

- Early help and prevention: <https://cact.org.uk/early-help-and-prevention>
- Education: <https://cact.org.uk/what-we-do/education>
- Equality, diversity and inclusion: <https://cact.org.uk/equality-diversity-and-inclusion>
- Social action and enterprise: <https://cact.org.uk/social-action-and-enterprise>
- Football and sports development: <https://cact.org.uk/football-and-sports-development>

Transfers outside of the UK

CACT's operations are based in the UK and we store the data we hold within the UK, for example as part of the services we provide to you through our websites.

We may use a supplier who stores data outside of the UK, we will only transfer your data to them if we are confident that your data will be adequately protected for example they have been determined to be an 'adequate' country by the Information Commissioner's Office, have signed up to the US Privacy Shield, and we have obtained contractual assurances from them that meet the data processing standards.

Your rights

You can ask us for a copy of the information we hold about you at any time by contacting us. If you are being supported by a 'specialist' such as a counsellor they may be processing your data as a Data Controller in which case you would need to contact them directly for your data.

We will generally supply any information you ask for within 30 days unless it is a particularly complex request. We will not charge you for this information other than in exceptional circumstances. We may also ask for proof of identity as we need to be sure we are only releasing your personal data to you. Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data, you can:

- Ask us to correct any data if it's found to be inaccurate or out of date
- To erase your personal data when it is no longer necessary for us to retain your data
- Withdraw consent (where processing your data is on this basis)
- Object to the processing of your data where CACT is relying on its legitimate interests as the legal basis for processing
- Ask us to place a restriction on further processing of your data, if you are in dispute in relation to the accuracy or the processing of your data

CACT complies with the National Data Opt-Out scheme however please be aware you may have provided explicit consent to us to process your data for specific reasons relating to the services you are being given access to.

As a charity CACT also complies with the Fundraising Regulator where you may request, through the Fundraising Preference Service (www.fundraisingpreference.org.uk) for CACT to stop contacting you in regard to fundraising. Please be aware that, depending on the service

being provided to you, there may be circumstances where CACT still need to be in touch with you other than for fundraising.

CACT will not retain personal data longer than is necessary and will only hold the data for compliance purposes and to meet our contractual obligations. For example, we will hold data from the registration forms for as long as you continue using our services, when you no longer wish to participate in our programmes or services, the data will be archived and securely destroyed three years after the date of your last contact with our services.

If you would like information about the data we hold on you, please contact our Data Protection Officer at DataProtectionOfficer@cact.org.uk.

If you believe that CACT has not complied with your data protection rights, you can complain to the Information Commissioner's Office (which regulates the use of personal data in the UK).

Confidentiality

CACT treats your contact with us as confidential unless there is a risk of serious harm or abuse to you or someone else. In this instance, we may have to pass this information onto a third party such as the emergency services.

If you are under 16. (or 25 with special educational needs or disabilities)

If you are under 16, you must have your parent's or guardian's permission to provide any personal data to us, and we may require them to provide certain data on your behalf.

Keeping your information up to date

We are keen to keep in touch with all our service users and supporters. Please contact us at DataProtectionOfficer@cact.org.uk if you would like to update your contact details.

Cookies

If using our website CACT uses cookies to provide you with the best possible website experience. By continuing to use the CACT website you are giving consent to cookies being used. For more information, please see our Cookie Policy: <http://www.cact.org.uk/cookie-policy>

Changes to this Notice

We regularly review our privacy notice and may make changes from time to time. Any changes made to our privacy notice will be posted on to our website.

If you would like to see CACT's Data Protection Policy, you can contact the Data Protection Officer at the address above or you can view CACT's policies on our website at:

<https://cact.org.uk/policies>

This privacy notice was last reviewed and updated in March 2020.