

 <b>YOUTH SPORT TRUST</b>	 <b>YOUTH SPORT TRUST</b> <b>ENTERPRISES</b>	 <b>YOUTH SPORT TRUST INTERNATIONAL</b>
Document Number: DP-N02 Version number: 5 Updated: 25 <sup>th</sup> February 2020	Document Owner: Data Protection Lead Approved by: Director of Finance & Governance Next Review By: 25 <sup>th</sup> February 2022	
<b>NOTICE</b>		
<b>PRIVACY NOTICE</b>  <b>For External Use</b>		

We are committed to respecting your privacy. This notice is to let you know how we promise to look after your personal information, what your privacy rights are and how the law protects you. We promise:

- To keep your data safe and secure
- Not to sell your data
- To enable you to update/amend your marketing preferences.

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services you may request from us. This also includes the safe delivery of any events you may attend or just managing our relationship with you.

When we hold or use your personal information as a **data controller** we will provide you with this privacy notice which sets out in detail:

- what information we hold about you (such as your contact details, address, etc.)
- how your personal information may be used and the reasons for these uses
- details of your rights.

Where we collect personal information from you directly, we will provide this privacy notice at the time we collect the personal information from you. Where we receive your personal information indirectly, we will provide this privacy notice when we first contact you, first pass the data to someone else or within a month, whichever is the earlier. If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us

We will only provide this privacy notice to you once, generally at the start of our relationship with you. However, if the applicable privacy notice is updated substantially, then we may provide you with details of the updated version. You are encouraged to check back regularly on our websites (“Sites”) for updates at [www.youthsporttrust.org](http://www.youthsporttrust.org) or [youthsporttrustenterprises.org](http://youthsporttrustenterprises.org).

## WHO WE ARE

References to **we**, **our** or **us** in this privacy notice are to the group of organisations below (“the Group”):

- **Youth Sport Trust (YST)** incorporated and registered in England and Wales with company number 4180163 and charity number 1086915, whose office is at SportPark, 3 Oakwood Drive, Loughborough, Leicestershire LE11 3QF. YST is registered with the Information Commissioner’s Office as a Data Controller – registration number Z7022336.
- **Youth Sport Trust Enterprises Limited (YSTE)** (wholly owned trading subsidiary of Youth Sport Trust) incorporated and registered in England and Wales with company number 3289889, whose office is at SportPark, 3 Oakwood Drive, Loughborough, Leicestershire LE11 3QF. YSD is registered with the Information Commissioner’s Office as a Data Controller – registration number Z9369568.
- **Youth Sport Trust International (YSTi)**, registered in England and Wales as The Youth Sport UK Charitable Trust, with charity number 1040320, whose office is at SportPark, 3 Oakwood Drive, Loughborough, Leicestershire LE11 3QF. YSTi is registered with the Information Commissioner’s Office as a Data Controller – registration number Z9402507.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Head of Compliance & Governance is our Data Protection Lead and has overall responsibility for data protection compliance across the group.

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**

When you have an interaction with us you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allow us to contact you directly, such as name, title, job role, address, email addresses and telephone numbers;
- your organisation details, such as a school, company or other organisation type;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- financial details, such as any credit/debit card and other bank/payment details you provide so that we can receive payments from you or make payments to you, details of any financial transactions with you, and insurances;
- use of and movements through our online systems, passwords, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events (including conferences, training courses, workshops, camps) or participation in any programmes or interventions associated with us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

### **Event Attendees and Programme Participation**

If you are involved in one of our events or participate in one of our programmes in any capacity (including, but not limited to: participant, athlete, volunteer, coach, official, deliverer etc) you may also provide us with or we may obtain the following additional **personal information** from you:

- identification documents, such as passport, driving licence and identity cards etc;
- professional details, such as qualifications, accreditations and experience;
- contact details of others, such as parents/guardians, next of kin, family members, coaches, carers and emergency contacts;
- specific details, such as gender, date of birth, kit size, preferences;
- travel information.

## **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 and sexual orientation;
- information about your health, including any disabilities, medical conditions and history, injuries, allergies, medication, immunisations and health professional information; and
- dietary and access requirements.

We may not collect all the above types of special category personal information about you. In relation to the 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 – equality of opportunity or treatment;
- the processing is necessary for the establishment, exercise or defence of legal claims;
- the processing is necessary for the provision of health care or treatment; or
- the processing is necessary for scientific research or statistical purposes in the public interest.

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.

### 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you: create an account on our site(s) at [www.youthsporttrust.org](http://www.youthsporttrust.org) or [youthsporttrustenterprises.org](http://youthsporttrustenterprises.org), purchase any services or products we offer online; sign-up for/attend one of our programmes or events; undertake any work for us; make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are the lead contact at one of our Cluster Member schools we also may collect personal information about you from your Cluster Co-ordinator.

If you are a pupil at a school we also may collect personal information about you from a teacher at your school.

If you are providing us with details of parents/guardians, next of kin, family members, coaches, carers or emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

### 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
<b>To administer any membership or account(s) you have with us, manage our relationship with you and deal with payments and any support, service or product enquiries made by you.</b>	All contact, organisation and membership details. Financial details, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract and/or accounts with us.
<b>To send you information which is included within your membership benefits package, including competitions and events, partner offers and discounts and any updates.</b>	All contact, organisation and membership details.	This is necessary to enable us to properly manage and administer your membership(s) with us.
<b>To arrange and manage any contracts for the provision of any products and/or services by us.</b>	All contact, organisation and membership details. Financial details.	This is necessary to enable us to properly administer and perform any contract for the provision of products/services by us.
<b>To arrange and manage any contracts for the provision of any products and/or services by you.</b>	All contact and organisation details. Financial details. Professional details.	This is necessary to enable us to properly administer and manage any contract with you and to ensure you are competent to provide the products/services.
<b>To administer and manage your attendance at events or participation in programmes/interventions.</b>	Contact, organisation and membership details. Identity documents, professional details, specific details, contact details of others, travel information.	This is necessary to enable us to properly administer, manage and deliver our events and programmes/ interventions and discharge our duty of care obligations.

<b>To use information about your physical or mental health or disability status and your requirements, to ensure your health and safety when attending any event or participating in one of our programmes/ interventions.</b>	Health and medical information. Dietary or access requirements.	We process special category personal data on the basis of it being necessary for the (potential) provision of health care or treatment.
<b>To arrange for any trip or transportation to and/or from an event.</b>	Identification documents, contact details of others, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of it being necessary for the (potential) provision of health care or treatment.
<b>To conduct monitoring, research and evaluation of our work.</b>	Contact, organisation and membership details. Records of your attendance/ participation. Specific details. Information about your race, ethnicity, religious beliefs, sexual orientation. Health and medical information.	We have a legitimate interest in doing so to ensure that we can monitor our reach, assess the impact of our work and inform the future development of programmes, interventions and events. We process special category personal data for scientific research or statistical purposes in the public interest.
<b>For the purposes of equal opportunities monitoring.</b>	Name, title, date of birth, gender, information about your race, ethnicity, religious beliefs, sexual orientation, health and medical information.	We have a legitimate interest to promote an environment that is inclusive, fair and accessible. We process special category personal data for reasons of substantial public interest – equality of opportunity or treatment.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements.</b>	Information about your criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations.
<b>To answer your queries or complaints.</b>	Contact and organisation 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 services we provide.
<b>For the purposes of promoting and marketing our work. (Adults, 18 years of age and above)</b>	Images in video and/or photographic form.	We have a legitimate interest to promote and market our work, including through the use of images of individuals participating in our programmes or attending our events. However, you always have a choice and an opt-out process will be provided.
<b>For the purposes of promoting and marketing our work. (Young people, under 18 years of age)</b>	Images in video and/or photographic form.	Where we have obtained parental consent to do so.
<b>The security of our IT systems.</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.

<p><b>To send you other marketing information we think you might find useful or which you have requested from us, including news and updates, funded opportunities (programmes and interventions), products and services (including events, membership and partner promotions), and fundraising opportunities.</b></p>	<p>All contact, organisation and membership details. Marketing preferences.</p>	<p>We believe that we can demonstrate that we have a legitimate interest to send you marketing information.  However, you always have a choice and you may unsubscribe or change your preferences at any time through our online preference centre.</p>
<p><b>Retention of records.</b></p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records to properly administer and manage our relationship with you 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.</p>

We will use your personal information as described in this privacy notice, but, for example, we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy to be contacted for these purposes.

For some of your personal information you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly discharge our contractual obligations or comply with legal obligations. 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 deliver our products or services to 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 member benefits to you.

## 5. DIRECT MARKETING

**Email, post and SMS marketing:** from time to time, under our legitimate interest to send you marketing information, we may contact you by email, post or SMS with information we believe you may be interested in. We have grouped this into four categories: news and updates, fundraising opportunities, funded opportunities, products and services.

If you would prefer not to receive certain information, you can update your preferences at any time by using the link we will send you or by logging into our website and choosing “Update Communication Preferences” in our portal. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any marketing communications we send to you, which will then unsubscribe you from receiving future marketing related to the same category.

Please note that unless you indicate otherwise, we may send you marketing information related to all four categories.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Details of how we disclose your personal information are set out below, but generally it is where we need to do so in order to run our organisation or to deliver our goods, services, programmes and events to you. In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

We do not sell, trade or rent your personal information to others.

We may share personal information with the following parties:

- **Any party approved by you.**
- **Within the Group:** YST, YSTE, YSTi
- **Funders**
- **Our supply chain partners & sub-contractors:** for example, athlete mentors, tutors, trainers, coaches, research/evaluation contractors, venues
- **IT system providers:** including CRM, websites, video and teleconference services
- **Our fulfilment and distribution sub-contractors:** such as couriers, import/export agents, shippers
- **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 may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "**Contacting Us**" section below.

## 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, we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier. 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 up to seven years after your last contact with us. Exceptions to this rule are:

- All special category data will be deleted or irreversibly anonymised within three months of the date of the event or programme/intervention for which it was collected.
- Information that may be relevant to personal injury claims, or 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 your interaction with us.

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, by contacting us using the details set out in the "**Contacting Us**" section below.

## 9. 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 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.

To exercise any of your 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 12 below. You can also unsubscribe from any **direct marketing (section 5)** by clicking on the unsubscribe link in the marketing messages we send to you.

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

## 10. SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

## 11. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. Any changes we may make to this privacy notice in the future will be posted on our Sites and, where appropriate, notified to you by e-mail. When we change this privacy notice in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes and should you object to any alteration, please contact us as set out in the "**Contacting Us**" section below.

## 12. CONTACTING US

In the event of any query or complaint about the information we hold about you, please email [privacy@youthsporttrust.org](mailto:privacy@youthsporttrust.org) or write to us at:

Data Protection Lead  
Youth Sport Trust  
SportPark  
3 Oakwood Drive  
Loughborough  
LE11 3QF

**AMENDMENT LOG**

<b>Date</b>	<b>Change</b>	<b>Made by</b>	<b>Approved by</b>
-	Original version	Clare Rourke	Janette Massey
14.05.18	Updated in accordance with GDPR requirements	Janette Massey	Surinder Sihra
31.07.18	Lawful bases reviewed and updated	Janette Massey	Surinder Sihra
24.07.19	Legitimate Interest for marketing	Janette Massey	Surinder Sihra
25.02.20	YSD to YSTE; legal basis of consent for use of images of young people under 18 for marketing.	Janette Massey	Surinder Sihra