

Charlton Athletic Community Trust **Privacy Notice**

Introduction

Charlton Athletic Community Trust (CACT) is committed to protecting and safeguarding any data you share with us, keeping it safe and only using it for the purposes for which it was collected. This privacy notice explains how we collect and use your personal data when you are in contact with us. It is written in accordance with the Data Protection Act 2018 (DPA) and the UK GDPR (as defined in the DPA). It also outlines your rights and how you can exercise them. You are welcome to contact us if you have any questions about our collection and processing of your data by writing to CACT's Data Protection Officer at Charlton Athletic Community Trust, CAFC Training Ground, Sparrows Lane, New Eltham, London, SE9 2JR or email: DataProtection@cact.org.uk

Personal Data - What is it?

Personal data refers to any information relating to an identified or identifiable living individual. 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. Information such as name, contact details and IP addresses are classified as personal data if it can be linked to a living person. It also applies to Personal Data held in photographs or video clips (including CCTV). It includes data held in any system or format, electronic or manual.

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. Please see the table below for further details.

How do we use your personal data?

We will only use your personal data for the purpose for which we collected it. 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 you look after such as a young person or another adult.

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. Please see the table below for further details on how we use your data and the legal bases for these.

How we keep your data safe

All personal data that we collect will be stored securely using appropriate security measures to prevent it from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Sharing your information

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

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.

When we use a data processor to deliver a service on behalf of CACT we have written agreements in place through which they guarantee the security of the personal data processed and undertake to comply with our security requirements. We do not allow third party data processors to process your data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Our data processors include but are not limited to:

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

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 data processor who processes data outside of the UK. Where processing takes place outside of the UK, the level of protection is guaranteed either by a decision of the Information Commission's Office that the country concerned ensures an adequate level of protection, or through the use of 'appropriate safeguards' in accordance with UK GDPR such as an approved code of conduct in the destination country or the use of appropriate data sharing agreements.

Your rights

You have the right to:

- ask to see the information we hold about you
- ask us to change information we hold about you if it is wrong
- withdraw your consent (where processing is based on your consent)
- ask us to delete the information we hold about you
- ask us to limit the way we use your information
- have your data transferred elsewhere
- complain to the ICO

As a charity CACT complies with any requests made through the Fundraising Preference Service (fundraisingpreference.org.uk) for CACT to stop contacting you in regard to fundraising.

If you would like information about the data we hold on you, please contact our Data Protection Officer at DataProtection@cact.org.uk we will respond as quickly as possible and no later than one month from the date we received your request (unless it is a particularly complex request in which case we may take up to three months to respond). We will not charge you for providing this information unless we think your request is excessive in which case we may charge a fee to cover our reasonable administration costs.

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 DataProtection@cact.org.uk if you would like to update your contact details.

Cookies

CACT uses cookies to provide you with the best possible experience when you visit our website. By continuing to browse the CACT website you are agreeing to our use of cookies. You can modify your settings at any time by clicking on 'cookie settings' at the bottom of the page. For more information, please see our Cookie Policy: <http://cact.org.uk/cookie-policy>

Changes to this Notice

We regularly review our privacy notice and may make changes from time to time, the latest version 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>

Please take a look at the following table to see how we collect, use and store personal data and the legal bases upon which we rely for doing so.

This privacy notice was last reviewed and updated in June 2023.

Next review: June 2024

Board approval September 2023

	Personal Data	Category	How we obtain it	Purpose	Legal basis	Storage period
1.	Name	standard	When you: i.enquire about one of our programmes or activities ii.book a holiday or training course iii.book a Short Break iv.request specific information v.attend an event vi. register with our youth services vii.enter a competition viii.apply for a job or a volunteering opportunity with CACT xi.give consent to receive marketing info xi. give consent for us to use your information for evaluation and monitoring purposes	i.to provide you with the products, services and information you request ii.to register your details for the course or service you've applied for. iii. to record and register when you make a booking online via our website iv. process your employment or volunteer application v. to manage our employees, trustees and volunteers	Contract/ consent	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 and Retention Schedules

	Personal Data	Category	How we obtain it	Purpose	Legal basis	Storage period
2.	Address	standard	As per 1	As per 1 Keep you up to date with our work (if you'd like us to)	Contract/ consent	As per 1
3.	Email address	standard	As per 1	As per 1 and 2	Contract	As per 1
4.	Phone number	standard	As per 1	As per 1	Contract	As per 1
5.	Date of birth	standard	As per 1	As per 1	Contract	As per 1
6.	Equal Opportunities information including: age, disability, ethnicity, gender, marital status, religion, sexual orientation	special	As per 1	For evaluation and monitoring purposes	Consent/ Necessary for our legitimate interests	As per 1
7.	Images which include video/CCTV footage and photograph	standard	When you give consent for use of your image or photo	To tell stories to help us promote our work Evaluation, monitoring and reporting	Contract/ Consent/ Necessary for our legitimate interests	As per 1
8.	Current activities and interests	standard		Keep you up to date with relevant information	Contract/ Necessary for our	As per 1

	Personal Data	Category	How we obtain it	Purpose	Legal basis	Storage period
					legitimate interests	
9.	Your health	Special		To provide you with the services and information you request	Consent	As per 1
10.	Any special educational needs or disability you tell us about	Special		To provide you with suitable services For monitoring, evaluation and reporting	Consent	As per 1
11.	Bank or payment details	Standard	when you make a donation	To process booking or payment details	Contract	As per 1
12.	Gift Aid status	Standard		To claim gift aid	Contract	As per 1
13.	Previous donations made	Standard		To keep you up to date with our work (if you'd like us to)	Consent	As per 1
14.	Courses and events booked and attended	Standard		Monitoring and evaluation purposes Look into and respond to complaints if any	Contract/ Necessary for our legitimate interests	As per 1