

# **GIRLS IN SPORT PRIVACY POLICY 2019**

## 1. INTRODUCTION

Girls in Sport is dedicated to protecting and valuing any personal data that is held. This privacy policy explains how and why personal data is collected and used and provides information around individual's rights. This policy applies to any personal data given to us, by the individual themselves or by others on their behalf. Personal data that is given to us may be used for the purposes or reasons explained in this privacy policy, or for reasons made clear before personal data is collected.

Personal data is information that relates to an identified or identifiable person. When Girls in Sport collect and use any personal data, our privacy policy is to be clear about how and why we process all personal data.

Girls in Sport processes personal data for different reasons, and the collection, processing, use, disclosure and retention periods for each reason are explained in the sections below.

Any personal data that is provided to us is provided either by the individual themselves, others on their behalf or from publicly available sources – this includes internet searches and company websites.

When Girls in Sport is provided with personal data about an individual from a third party, we ask that the they inform the individual of the required information around the use of their data. When required, reference can be made to this privacy policy.

## 2. SECURITY OF DATA

Girls in Sport ensures that all data held is taken seriously. The required employees have received training and are trained on data protection, maintaining confidentiality and ensuring security.

Girls in Sport has a framework of policies and procedures which ensure that the appropriateness of the measures that we have to keep data secure is regularly reviewed.

All information that an individual provides to us is held on secure servers.

However, we regret that the transference of information and data via the internet servers are not completely secure. Girls in Sport will protect any personal data to the best of our ability, although we cannot provide a guarantee of the security of any data that is transmitted to our site. Any transmission is at the individual's own risk.

Once we have received an individual's personal data, we will ensure that we follow strict policies and procedures to try and prevent any unauthorised access.

# 3. DATA THAT GIRLS IN SPORT HOLDS

## 3.1 Our Donors' and Beneficiaries' Data

Girls in Sport holds the personal data of our donors and our supporters, and these could be either individuals or organisations. We hold personal data regarding our beneficiaries of which we provide numerous services. The data held depends on the services we provide to each individual.

When we engage with individuals, we may collect and process the individual's personal data so that we can provide our services, to collect and process any donations, or to complete other fundraising and/or charitable event and/or activity. We ask that individuals provide personal data that is required for Girls in Sport to complete our charitable operations only, and nothing else.

#### 3.1.1 Reasons for the processing of data

The data that Girls in Sport collects for fundraising and/or charitable events and/or activities, is used for numerous reasons, as follows;

- To provide services to our beneficiaries
  - Any data that is processed, is done so in line with the purpose of the collection. In some occasions data may be clarified through documentation which is given before any data is processed.
- Our donor's needs
  - The personal data of our donors and supporters is processed so that Girls in Sport can complete fundraising and/or charitable events and/or activities, as well as being able to communicate with our donors and supporters about our events and/or activities. Personal data may be processed to ensure that our donor's and our supporter's needs are met.
- For administration purposes
  - To manage our charity and the services that we provide, Girls in Sport will collect and process personal data. This could include charity records, managing the relationships between donors, hosting fundraising and/or charitable events and/or activities and ensuring that our internal operating systems are maintained.
- For regulatory purposes
  - Girls in Sport may collect and process personal data to ensure that statutory, legal or ethical requirements are fulfilled. This is so that Girls in Sport can continue to provide services to our beneficiaries.

#### 3.1.2 The data that we process

Any data that is processed by Girls in Sport depends on the service provided and to whom we provide the service to. The reasons as to why data is processed are as follows;

- Services to our beneficiaries
  - Any personal data that we collect and process regarding our beneficiaries may include contact details, media and other relevant data.
- Services to our donors and supporters
  - Any personal data that we collect and process regarding our donors may include contact details, their history of donations, any financial information including banking information, their interests, their address and any other relevant information.

## 3.1.3 Data holding time periods

Girls in Sport holds any personal data that is processed by ourselves for as long as we see is necessary for the purpose of which the data was originally collected for. They may be occasions which may require personal data to be held for a longer time period, however this should be for legal purposes.

Any personal data that Girls in Sport holds should be securely archived with access which is restricted to the relevant employees, alongside other safeguarding process that are necessary. This data will be reviewed every so often to ensure that all data we hold is still relevant and necessary.

## 3.2 OUR STAFF

Girls in Sport will collect personal data from our staff as part of our administration, management and promotion of our charitable needs. This includes the personal data of our volunteers, including volunteers in-country, and our trustees.

#### 3.2.1 Applicants

If an individual is applying to work for us at Girls in Sport, their personal data will be collected and processed through the application process. There are numerous reasons that applicants' personal data is collected.

- For employment purposes
  - Girls in Sport will process an applicant's personal data so that we can assess their potential employment at Girls in Sport.
- For administration and management purposes
  - Girls in Sport may use applicant's personal data to make informed decisions for administration and management.

Any personal data collected for applicants will be held for a length of time that Girls in Sport sees necessary for the purpose of which the data was originally collected for. If ten years has passed, the purposes of which the data was originally collected no longer becomes necessary.

## 3.3 OUR BUSINESS PARTNERS

Girls in Sport collects and processes personal data regarding our business partners, local partners, suppliers, influences, sponsors, contractors and any individuals

associated with them. We hold data that we collect to manage our relationships, to contract and receive services and to provide services to our beneficiaries.

#### 3.3.1 Reasons for processing data

- To receive goods and services
  - Girls in Sport processes any personal data regarding to our business partners and their employees in order to receive their services.
- To provide services to our beneficiaries
  - If a business partner helps us provide services to our beneficiaries, Girls in Sport will process any personal data in relation to the individuals involved in providing these services.
- To administer, manage and develop our charity and the services we provide
  - Girls in Sport will process any personal data in relation to our business partners so that we can continue to run our charity. We use the data collected to manage our business relationships, to develop our charity and the services we provide, to manage our IT systems, to host or provide for fundraising and/or charitable events and/or activities, and to manage our website systems.
- For security, quality and risk management purposes
  - Girls in Sport has the suitable security precautions in place to protect our business partners' information and personal data. These precautions include the detection, investigation and resolution of any security threats. Girls in Sport has policies and procedures in place to ensure that the quality of the services we provide is adequate and that all risks are managed appropriately and effectively.
- To comply with legal requirements and regulations
  - Girls in Sport is dedicated to our legal obligation in meeting and complying with all legal requirements and regulations.

## 3.3.2 The data that we hold

Girls in Sport holds the names, contact details, banking and other financial information of our business partners.

## 3.3.2 Data holding time periods

Girls in Sport holds any personal data that is processed by ourselves for as long as we see is necessary for the purpose of which the data was originally collected for. They may be occasions which may require personal data to be held for a longer time period, however this should be for legal purposes.

Any personal data that Girls in Sport holds should be securely archived with access which is restricted to the relevant employees, alongside other safeguarding processes that are necessary. This data will be reviewed every so often to ensure that all data we hold is still relevant and necessary.

## 4. **VISITORS TO OUR WEBSITE**

Individuals should be aware that their personal data will be collected through an automated tracking system when they visit our website and interact with different forms within the website itself.

Any personal data that individuals fill into a form on our website will be collected, alongside when they contact us via phone or e-mail. This includes the information that an individual provides when they make an inquiry to take part in a fundraising and/or charitable event and/or activity.

#### 5. SHARING PERSONAL DATA

Girls in Sport will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security precautions in place to protect any data and to comply with our data protection, confidentiality and security standards.

Personal data held by us may be transferred to:

- Third party organisations that provide applications/functionality
- Data processing
- IT services

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems.

Occasionally, Girls in Sport may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

#### 6. LOCATIONS OF DATA PROCESSING

Where possible, personal data resides within the EU but may be transferred to, and stored at, a destination outside the European Economic Area (EEA).

#### 7. INDIVIDUAL'S RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.
- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data.
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us.

- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email to info@girlsinsport.org

#### 8. COMPLAINTS

Girls in Sport hopes that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to us at <u>info@girlsinsport.org</u> with the subject as 'Complaint'. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office. For further information on your rights and how to complain to the Information Commissioner's Office, please visit <a href="https://ico.org.uk/concerns">https://ico.org.uk/concerns</a>.