

Registered Charity No: 1127014

## **SBitC Privacy Policy**

#### **Contents**

- 1. Introduction Introduction
- 2. General Data Protection Regulation
- 3. Why do we collect and process your information?
- 4. Our Responsibilities
- 5. What information do we collect about you?
- 6. How we obtain and store your information?
- 7. Do we share you information?
- 8. Your Rights
- 9. Contact the Information Comissioner's Office
- 10. Contact Sky Blues in the Community

#### 1. Introduction

Sky Blues in the Community is a registered charity (charity number: 1127014) that delivers community-based initiatives on behalf of Coventry City Football Club across Coventry and Warwickshire.

At Sky Blues in the Community we have a number of core values that inform how we operate, how we communicate and how we conduct ourselves on a daily basis. These core values are to:

- Enjoy what we do
- Deliver our services to the highest standards
- Exceed expectations
- Be open and transparent
- Learn from, and share best practice
- Be professional
- Provide an excellent experience
- Work in partnership
- Be honest, trustworthy and act with integrity.

In line with our core values and your rights as a customer of Sky Blues in the Community, this Privacy Policy explains the types of personal data we may collect about you when you interact with us. It also explains why we need your information as well as how we store and handle your data.



We hope this Privacy Policy gives you all of the information you need. However, if you have any further questions, please do get in touch with us via the contact details given at the end of this Privacy Policy.

### 2. General Data Protection Regulation

The General Data Protection Regulation (GDPR) outlines a number of different reasons for which an organisation may collect and process your personal data.

Under GDPR, there are six available lawful bases for processing personal data:

- 1. Consent
- 2. Contract
- 3. Legal Obligation
- 4. Vital Interests
- 5. Public Task
- 6. Legitimate Interest

More information about General Data Protection Regulation and these lawful bases can be obtained from the Information Commissioner's Office (ICO) – the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. See: <a href="https://ico.org.uk">https://ico.org.uk</a>

# 3. Why do we collect and process your information?

Collecting and processing personal information allows us to carry out our services in a safe and efficient manner as well as supports us to record and report on the impact our services have on the local community.

# 4. Our Responsibilities

The law requires us to tell you basis on which we collect and process your information.

At Sky Blues in the Community we only collect and process the information we need to carry out our services and to comply with the General Data Protection Regulation – adhering to the seven key principles.

For all Sky Blues in the Community services we have individual Privacy Notices in place relevant to each service. These notices outline what, why and how we collect and process personal information.



Due to the number of different services that Sky Blues in the Community provides, the information we collect about you may differ depending on how you interact with us Community. However, with all data collection, we will always treat your information with care and take the appropriate steps to protect it.

In most cases, we will obtain your consent to collect and process your information and the information of those you as a Parent/Guardian are responsible for. When obtaining your consent, we will always outline the reasons why we are collecting this personal information and what we will be using it for.

Sometimes we will want to contact you about the services that Sky Blues in the Community provides via the contact details that you share with us. We will always obtain your consent for sending you marketing information about our services.

In some cases, under legitimate interest, we may process your information without your consent. For example, as a charity, we receive funding and must report back to funders on the impact of their funding. Whilst we do not share personal information funders without consent, we will process the personal information of beneficiaries of funding to report accurately to funders. How we do this is specified in the Privacy Notice for each individual service that we provide.

Under legal obligation, we will collect and process your personal information to comply with common law or statutory obligation. For example, this may include disclosing information to organisations such as HMRC and the National Crime Agency.

## 5. What information do we collect about you?

The data we collect at Sky Blues in the Community is always adequate, relevant and limited to what is necessary.

The information we collect and process about you or your child(ren) will be specific to the service you are engaging with at Sky Blues in the Community.

The information we collect and process about people who engage with Sky Blues in the Community services may include some of the following: name, telephone number, email address, address, date of birth, ethnicity, health, sexual orientation and religious belief.

The information we collect and process about people who engage with us for recruitment purposes may also include: employment history, reference details, national insurance number, bank details, passport and birth certificate information.

The Privacy Notice for each service you engage with at Sky Blues in the Community outlines what, why and how we collect and process personal information.



## 6. How we obtain and store your information?

Most of the information we obtain about you is provided to us directly by you.

In some cases, we obtain information via someone else. For example, for our Football Holiday Camp bookings we use a website known as 'Official Soccer Schools' (OSS). OSS is an online booking service which promotes popular soccer schools and sports activities available at EFL club community schemes in England and Wales; enabling busy parents and guardians to book places at ease. When parents/guardians make a booking through OSS the information is sent to us via an automated email.

All information we obtain about you is always treated with care and we take the appropriate steps to protect it. We have policies and procedures in place to ensure we endeavour to collect, process and store information about you securely.

## 7. Do we share you information?

In most cases we do not share you information with any third parties.

In some cases we do need to share your information to carry out our services. For example, as 'making a difference' is very much at the heart of our charity, we will often put together stories known as 'case studies' to demonstrate the impact we have had on an individual. Case studies may include names, ages and other personal information about individuals. These case studies may be shared with funders or even publically. However, when we need to share your information with a third party, we will obtain your consent to do this – unless it is a legal obligation.

# 8. Your Rights

The General Data Protection Regulation and under data protection law, you have rights. The rights avaible to you may depends on our reasons for processing your information:

- The right to be informed you have the right to be informed about the collection and use of your personal information (we do this via Privacy Notices).
- The right of access you have the right to access the personal information we collect and process about you (this right always applies).
- The right to rectification you have the right to rectify inaccurate informed or complete incomplete personal information (this right always applies).
- The right to erasure you have the right to have your personal information erased (this only applies in certain circumstances).
- The right to restrict processing you have the right to restrict or suppress the use of your personal information (this only applies in certain circumstances).



- The right to data portability you have the right to obtain and reuse your personal information for your own purposes across different services (this right only applies to information you have provided to a controller).
- The right to object you have the right to object to the processing of your personal information (this only applies in certain circumstances).
- Rights in relation to automated decision making and profiling.

More information about your rights can be obtained from the Information Commissioner's Office (ICO): <a href="https://ico.org.uk">https://ico.org.uk</a>

#### 9. Contact the Information Comissioner's Office

The Information Commissioner's Office (ICO) is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals. If you are not happy with the collection or use of your personal information, you have the right to lodge a complaint with the ICO:

Telephone: <u>0303 123 1113</u>. Website: <u>https://ico.org.uk</u>

## 10. Contact Sky Blues in the Community

If you have any questions about this Privacy Policy about the way in which we process your data, or if you wish to change the way we use your data, including how we communicate with you, then please contact us:

#### Address:

Sky Blues in the Community Ricoh Arena Stadium Judd's Lane Coventry CV6 6GE

Telephone: 024 7678 6349 Email: sbitc@ccfc.co.uk

It's likely that we'll need to update this Privacy Policy from time to time but you're welcome to access the Privacy Policy when you wish to.