



NORTHAMPTON TOWN F.C.

COMMUNITY

GDPR Privacy Notice for Participants

	Name of Company	Company Contact Details
Data Controller	Northampton Town FC Community Trust	01604 683726

Introduction: NTFCCT collects and processes personal information, or personal data, relating to participants who join their programmes. This personal information may be held by NTFCCT on paper or in electronic format.

NTFCCT is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**. The purpose of this privacy notice is to make you aware of how and why NTFCCT will collect and use your personal information during your registration with any NTFCCT community programme. NTFCCT are required under the GDPR to notify you of the information contained in this privacy notice.

This privacy notice applies to all participants enrolled on NTFCCT community programmes and members of all affiliated clubs to NTFCCT

NTFCCT has appointed a **Data Compliance Manager** to oversee compliance with this privacy notice. If you have any questions about this privacy notice or about how NTFCCT handle your personal information, please contact them on the details below:

Data Compliance Manager	
Name	James Hill
Job Title	Marketing and Communications Officer
Telephone Contact	01604 683726
Email	James.hill@ntfc.co.uk
Postal Address	Northampton Town FC, Sixfields Stadium, Upton Way, Northampton, NN5 5QA

The Data Protection Principles: Under the GDPR, there are six data protection principles that NTFCCT must comply with. **These provide that the personal information NTFCCT hold about you must be:**

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

NTFCCT is responsible for, and must be able to demonstrate compliance with, these data protection principles. This is called the Principle of Accountability.

What types of personal information do NTFCCT collect about you? Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data **i.e.** where all identifying particulars have been removed. There are also **special categories** of personal information which requires a higher level of protection because it is of a more sensitive nature. The special categories

of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

NTFCCT collects, uses and processes a range of personal information about you during the sign-up process and engagement in a programme. **This includes (as applicable):**

- Your contact details, including your name, address, telephone number and personal e-mail address
- Other personal data such as date of birth or age
- Details on your medical history including any medical conditions you may have or medication you may be on
- Details of an emergency contact (name, contact number, relationship to you)

NTFCCT may also collect, use and process the following special categories of your personal information (as applicable):

- Whether or not you have a disability for which NTFCCCT needs to make reasonable adjustments during the session
- Information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation

How do NTFCCCT collect your personal information? NTFCCCT collects personal information about you during the registration process for projects either directly from you, or sometimes from a third party such as teams affiliated to NTFCCCT.

You are under no statutory or contractual obligation to provide personal information to the NTFCCCT during the sign up process.

Your personal information may be stored in different places, including on our CRM system and in other IT systems, such as the e-mail system.

Why and how do NTFCCCT use your personal information? NTFCCCT will only use your personal information when the law allows the organisation to. These are known as the **legal bases for processing**. NTFCCCT will use your personal information in one or more of the following circumstances:

- Where necessary to respond to enquiries you make directly or through our website
- Where NTFCCCT needs to notify you of changes to sessions or activities or to update you on new activities that may be taking place
- Where NTFCCCT need to comply with a legal obligation
- Where it is necessary for NTFCCCT's legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override NTFCCCT interests.

NTFCCT need all the types of personal information listed under "**What types of personal information do NTFCCCT collect about you?**" primarily to enable the organisation to take steps at your request to register you onto a community programme, and to enable NTFCCCT to comply with its legal obligations.

The purposes for which NTFCCCT are processing, or will process, your personal information are to:

- Enrol you onto a community programme delivered by NTFCCCT
- Report back data to project funding partners
- Provide you with information on other similar programmes we deliver
- To identify and prevent fraud
- Where the processing enables us to enhance, modify, personalise or otherwise improve our services/communications for the benefit of our customers
- Comply with statutory and/or regulatory requirements and obligations
- Ensure compliance with your statutory rights
- Enable NTFCCCT to establish, exercise or defend possible legal claims.

Please note that NTFCCCT may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

What if you fail to provide personal information? If you fail to provide certain personal information when requested, NTFCCCT may not permit you to engage in activity properly or at all, or NTFCCCT may be prevented from complying with NTFCCCT legal obligations. You may also be unable to exercise your statutory rights.

Why and how do NTFCCT use your sensitive personal information? NTFCCT will only collect and use your sensitive personal information, which includes special categories of personal information, when the law allows NTFCCT to.

Some special categories of personal information **i.e.** information about your health is processed so that NTFCCT can perform or exercise its obligations or rights in line with NTFCCT's Data Protection Policy.

NTFCCT may also process information about your health and information about any criminal convictions and offences where NTFCCT have your explicit written consent. In this case, NTFCCT will first provide you with full details of the personal information NTFCCT would like and the reason it is needed, so that you can properly consider whether you wish to consent or not. It is entirely your choice whether to consent. Your consent can be withdrawn at any time.

The purposes for which NTFCCT are processing, or will process, health information are to:

- Assess your suitability to engage in activities
- Comply with statutory and/or regulatory requirements and obligations
- Reporting information back to project commissioners such as public health if on targeted health programmes
- Comply with the duty to make reasonable adjustments for disabled participants and with other disability discrimination obligations
- Ensure compliance with your statutory rights
- Monitor equal opportunities.

Where NTFCCT processes other special categories of personal information **i.e.** information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities monitoring for the organisation and for reporting headline statistics to funders and is in line with NTFCCT's Data Protection Policy. Personal information that NTFCCT uses for these purposes is either anonymised or is collected with your explicit written consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

NTFCCT may also occasionally use your special categories of personal information, where it is needed for the establishment, exercise or defence of legal claims.

Change of purpose: NTFCCT will only use your personal information for the purposes for which it was collected **i.e.** for signing up to take part in a community programme.

Who has access to your personal information? Your personal information may be shared internally within NTFCCT for the purposes of reporting, including with managers in the department which run the programme and coaches if is necessary for the performance of their roles. This information will also be shared with the committees of our affiliated teams including walking football and women and girls where applicable.

How does NTFCCT protect your personal information? NTFCCT has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, NTFCCT limit access to your personal information to those employees, workers and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from NTFCCT's **Data Compliance Manager**.

Where your personal information is shared with third parties, NTFCCT require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. NTFCCT only allow them to process your personal information for specified purposes and in accordance with NTFCCT's written instructions and NTFCCT do not allow them to use your personal information for their own purposes.

NTFCCT also has in place procedures to deal with a suspected data security breach and NTFCCT will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where NTFCCT are legally required to do so.

For how long does NTFCCT keep your personal information? NTFCCT will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

- a) Any minimum statutory or other legal, health and safety or reporting requirements for particular data or records
- b) The retention of some types of personal information for up to **six years** to protect against legal risk **e.g.** if they could be relevant to a possible legal claim in a County Court or High Court.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from NTFCCT IT systems and NTFCCT will also require third parties to destroy or erase such personal information where applicable.

In some circumstances NTFCCT may anonymise your personal information so that it no longer permits your identification. In this case, NTFCCT may retain such information for a longer period.

Your rights in connection with your personal information: As a data subject, you have a number of statutory rights. **Subject to certain conditions, and in certain circumstances, you have the right to:**

- **Request access to your personal information:** This is usually known as making a data subject access request and it enables you to receive a copy of the personal information NTFCCT hold about you and to check that NTFCCT are lawfully processing it
- **Request rectification of your personal information:** This enables you to have any inaccurate or incomplete personal information NTFCCT hold about you corrected
- **Request the erasure of your personal information:** This enables you to ask NTFCCT to delete or remove your personal information where there's no compelling reason for its continued processing **e.g.** it's no longer necessary in relation to the purpose for which it was originally collected
- **Restrict the processing of your personal information:** This enables you to ask NTFCCT to suspend the processing of your personal information **e.g.** if you contest its accuracy and so want NTFCCT to verify its accuracy
- **Object to the processing of your personal information:** This enables you to ask NTFCCT to stop processing your personal information where NTFCCT are relying on the legitimate interests of the business as the legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- **Data portability:** This gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact NTFCCT's **Data Compliance Manager**.

NTFCCT may need to request specific information from you in order to verify your identity and check your right to access the personal information, or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact NTFCCT's **Data Compliance Manager**. Once NTFCCT have received notification that you have withdrawn your consent, NTFCCT will no longer process your personal information for the purpose you originally agreed to, unless NTFCCT have another legal basis for processing.

If you believe that NTFCCT has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

Transferring personal information outside the European Economic Area: NTFCCT will not transfer your personal information to countries outside the European Economic Area.

Changes to this privacy notice: NTFCCT reserves the right to update or amend this privacy notice at any time. NTFCCT will issue you with a new privacy notice when NTFCCT make significant updates or amendments. NTFCCT may also notify you about the processing of your personal information in other ways.

Contact: If you have any questions about this privacy notice or how NTFCCT handle your personal information, please contact NTFCCT's **Data Compliance Manager** on the details provided at the beginning of this Privacy Notice.