

# Privacy Notice

## **About this policy**

Sport Structures is committed to protecting the privacy of its data subjects by handling data it collects in a safe and responsible way.

This policy sets out how Sport Structures will do this.

## **Types of data Sport Structures collects**

Sport Structures will collect and process personal data and sensitive personal data.

Personal data only includes information relating to living individuals where they can be either:

- directly identified from a piece of information
- indirectly identified from a combination of information

Sensitive personal data is a type of data that reveals or concerns an individual's:

- race or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data (when used for identification purposes)
- health
- sex life
- sexual orientation

The personal data we collect includes:

- name, address, date of birth, gender and contact details including email address and telephone number
- qualification details including skills, experience and employment history
- recruitment information including right to work documents, CVs and covering letters
- information about next of kin and emergency contacts

The sensitive personal data we collect includes:

- information relating to equal opportunities monitoring including ethnic origin, sexual orientation, disability and religion

## **Why Sport Structures collects this data**

Sport Structures collects this information so it can comply with its legal and health and safety obligations as well as the following:

- allowing Sport Structures to build a comprehensive picture of its workforce including its diversity
- shaping the development and retention of its employees
- shaping the development of its policies
- allowing employees to be properly paid
- allowing employees to have the appropriate employee benefits provided
- allowing courses to be inclusive and engaging for everyone

### ***Legal basis for processing data***

There are 6 grounds for lawfully processing personal data. These are:

- consent
- contract
- legal obligation
- vital interests
- public task
- legitimate interests

Sport Structures process the data it collects on the following basis/bases:

- Consent
- Contract
- Legitimate Interests

With regards to processing special category data, Sport Structures processes the information on the grounds of explicit consent as well as the following conditions under Article 9 of the UK General Data Protection Regulation (UK GDPR):

- Article 9(2)(a) – The data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- Article 9(2)(g) – Processing is necessary for reasons of substantial public interest, on the basis of UK law, in particular for promoting equality of opportunity or treatment

### ***Data retention***

Sport Structures follows the UK GDPR rules on data retention. This means it:

- only keeps data for as long as it's needed – all data is retained for the shortest length of time necessary
- will securely delete or anonymise documents no longer needed
- complies with requests for data to be changed or deleted as long as there are no other legal grounds or overriding legitimate grounds to not do so
- complies with an individual's request to see data held on them unless there are exemptions under the UK GDPR that apply
- carries out data audits to make sure it doesn't keep data for longer than necessary and to help responses to subject access requests

### ***Sharing data***

Sport Structures may share data internally with relevant departments such as the HR team, managers or supporting staff. However, this will only be done if it is required.

There may be occasions where Sport Structures shares data it has collected with third parties. These instances may include but are not limited to:

- when requested to by law
- ensuring the safety and/or wellbeing of someone
- when references are requested from other employers
- facilitate a contract of employment

Sport Structures regularly shares data with third parties outside of the organisation. To ensure that data is processed and properly retained we have a formal agreement, called an information sharing agreement (ISA) which sets this out. This includes:

- what data is shared
- which laws allows the sharing of this data
- how the data is shared
- who the agreement is between
- necessary security requirements

### ***Cookie Use and Online Tracking***

When you visit our website, Sport Structures may collect information about your visit through the use of cookies and similar tracking technologies.

What are cookies? Cookies are small data files stored on your device when you access our website. They help us provide essential website functions, improve user experience, and collect analytical data.

Types of cookies we use:

- Essential cookies – Required for website functionality (e.g., login, form submissions).
- Performance and analytics cookies – Used to understand how visitors use our website (e.g., Google Analytics)
- Functionality cookies – Enable enhanced features or personalisation.
- Marketing and advertising cookies – May track user behaviour across websites for targeted advertising (used only with your consent).

Consent and control: We use a cookie banner to inform users on their first visit to our website and to collect their consent where required. You can manage your cookie preferences at any time through your browser settings or the cookie banner.

Third-party cookies: Some cookies are placed by third-party services we use on our site. These may collect data independently and are subject to their own privacy policies.

### ***Data subjects' rights***

Sport Structures is obligated to inform data subjects of their data protection rights. Data subjects have the right to:

- access – data subjects can request Sport Structures provide them with the personal data it holds on them

- rectification – data subjects can request Sport Structures correct information on them that they believe to be incorrect
- erasure – personal data can be deleted under certain conditions
- restrict processing and is where Sport Structures restrict processing of personal data under certain conditions
- object to processing – this is where data subjects can object to their personal data being processed under certain conditions
- data portability – data subjects can request Sport Structures transfer data it collects on them to a third party or to them under certain conditions
- rights related to automated decision-making and profiling – data subjects have the right to not be subject to decisions based solely on automated processing (including profiling) that have legal or significant effects, and can request human intervention or challenge such decisions

### ***Withdrawing consent***

Data subjects have the right to withdraw consent if they change their mind about Sport Structures having access to their personal data. If this arises, please contact Sport Structures by email – [info@sportstructures.com](mailto:info@sportstructures.com) or telephone – 0121 455 8270

### ***Making a complaint***

If a data subject wishes to complain about how Sport Structures have handled their personal data they should contact Sport Structures' Data Protection Officer;

The designated Data Protection Officer is:
Colin Geenes <a href="mailto:colin.geenes@sportstructures.com">colin.geenes@sportstructures.com</a> 0121 455 8270

If data subjects remain unhappy with how Sport Structures used their data after raising a complaint with Sport Structures, they can complain to the Information Commissioner's Office.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

The ICO's helpline number is 0303 123 1113 or you can make a complaint online