



Swindon Town FC  
**Community Foundation**

**Swindon Town FC Community Foundation**  
Football in the Community

The Energy Check County Ground, County Road, Swindon, Wiltshire SN1 2ED  
**Tel:** 01793 421303 | **Mob:** 07966 305320 / 07919 112982

[www.stfcfoundation.com](http://www.stfcfoundation.com)

## Swindon Town FC Community Foundation

### Privacy Policy for GDPR

Latest review: August 2021

Date of next review: August 2022

This policy and set of procedures will be reviewed on an annual basis, or sooner should any major incident, organisational or legislative change arise.

Signed

Shane Hewlett (Designated Safeguarding Officer)

Signed

Caroline Brown (Trustee)



CHARITY NUMBER 1121820

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## 1. Introduction

Swindon Town FC Community Foundation ("we", "our", "us") take your privacy very seriously.

This Privacy Notice sets out how we use and look after the personal information we collect from you. We are the data controller, responsible for the processing of any personal data you give us. We take reasonable care to keep your information secure and to prevent any unauthorised access to or use of it.

## 2. What Personal Data We Hold and Relevance of Obtaining Parental/Guardian Consent for Minors

Personal data means any information about an individual from which that individual can be identified.

We collect, use, store and transfer some personal data of our participants (minors) and their parents or guardians.

You provide information about yourself when you register with the Foundation, and by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise.

The information you give us may include your name, date of birth, address, e-mail address, phone number, gender, and the contact details of a third party in the case of emergency. We may also ask for relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding. Where we hold this data, it will be with the explicit consent of the participant or, if applicable, the participant's parent or guardian.

Where we need to collect personal data to fulfil Foundation responsibilities and you do not provide that data, in the event of medical emergency, we may not be able administer correct treatment.

## 3. Why We Need Your Personal Data

We will only use personal data for any purpose for which it has been specifically provided.

The reason we need participants personal data is to be able to deliver our Foundation activities and to provide the services that you are signing up to when you register with the Foundation. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a participant to provide the services you are registering for.

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.





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Purpose/Processing Activity	Lawful Basis for Processing under Article 6 of the GDPR
Processing participants forms and payments.	Performance of a contract.
Sharing data with coaches, managers or officials to deliver Foundation activities.	Performance of a contract.
Sharing data to provide information about renewals or invitation to social events.	The Foundation has a legitimate interest to maintain participant correspondence with consent.
Sharing data with third-party service or facility providers.	The Foundation has a legitimate interest to run the organisation efficiently and as it sees fit. Provision of some third-party services is for the benefit of the Foundation and participants.
Sharing anonymised data with a funding partner as condition of grant funding e.g. Local Authority.	The Foundation has a legitimate interest to run the organisation efficiently and as it sees fit. Application for funding is a purpose that benefits the Foundation and its participants.
Sending out marketing information such as newsletters and information about promotions and offers from sponsors	Consent. We will only send you direct marketing if you are an existing participant or other associated individual and you have not previously objected to this marketing, or, you have actively provided your consent.
To ensure we understand possible health risks	Consent. We will only process details on your medical history with your consent.
Retention of Personal Data	Personal data shall be kept for no longer than is necessary for the purposes for which it is being processed. There are some circumstances where personal data may be stored for longer periods (e.g. archiving purposes in the public interest) The Foundation will ensure personal data is securely disposed of when no longer needed. This will reduce the risk that it will become inaccurate, out of date or irrelevant.



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#### 4. Who We Share Your Personal Data With

We may disclose your personal information to coaches to comply with a legal obligation; or to protect the rights, property, or safety of our participants, or others.

The Foundation's data processing may require your personal data to be transferred outside of the UK. Where the Foundation does transfer your personal data overseas it is with the sufficient appropriate safeguards in place to ensure the security of that personal data.

#### 5. Protection of Your Personal Data

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

How long we hold your personal data

We will not keep personal data longer than is necessary for the purpose(s) for which they were collected. We will take all reasonable steps to destroy or delete data which is no longer required, as per our privacy notice.

#### 6. Your Rights Regarding Your Personal Data

As a data subject, you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As a data subject, you are not obliged to share your personal data with the Foundation. If you choose not to share your personal data with us we may not be able to register your/ your child's place.

We may update this Privacy Notice from time to time, and will inform you to any changes in how we handle your personal data.





## 7. References

- Swindon Town FC Community Foundation Information Security Policy
- Swindon Town FC Community Foundation Information sharing Policy
- Swindon Town FC Community Foundation Safeguarding and Child Protection Policy and Procedures

### **Equality, Diversity and Inclusion**

Football is for everyone, it belongs to, and should be enjoyed by anyone who wants to participate in it, whether as a player, official, staff member, volunteer or spectator. Swindon Town FC Community Foundation recognises that providing equality of opportunity, valuing diversity and promoting a culture of inclusion are vital to our success.

We want our staff, coaches, volunteers and participants to reflect the diversity of the communities that we serve and influence. We aim to be a place where people can be free to be themselves no matter what their identity or background. We will ensure that equality is embedded in all of our activities, policies and decisions.

To report incidents and allegations of discriminatory actions or behaviour, our equality, diversity and inclusion policy is available at [www.stfcfoundation.com](http://www.stfcfoundation.com)

### **Contact / Queries**

If you have any questions or queries with this Privacy Policy, then please contact Shane Hewlett (Assistant Head of Swindon Town FC Community Foundation)

You can contact Shane either by email or telephone on the details

below: Email: [shane@stfcfoundation.com](mailto:shane@stfcfoundation.com)

Telephone: 07919112982

*If you have any issues or grievances then please see Swindon Town FC Community Foundation Complaints and Appeals Policy*

*Alternatively please refer to the ICO Website <http://ico.org/concerns>*

