



Sportily Privacy Notice

1. Introduction

We take your privacy seriously

Sportily is committed to respecting the privacy of all those for whom we hold personal information/data at any time. If you have any queries please do get in touch.

This Privacy Notice sets out specifically the data protection and data privacy policies that fall within the oversight of Sportily as a 'Data Controller', and it explains how your personal data is processed by Sportily and for what purposes.

Sportily takes personal privacy seriously and we seek to be transparent, responsible and respectful in the way that we use personal information.

Sportily is committed to processing personal information we hold in accordance with current and developing national data legislation. This includes the General Data Protection Regulation (the "GDPR") which governs the processing of personal data; and the Data Protection Act 1998 and the Privacy and Electronic Communications Regulations 2003.

Sportily will comply with its obligations under the "GDPR" by processing information in line with the legal bases set out in law (see section 4 below). Sportily will keep personal information up to date; store and destroy information securely; not collect or retain excessive amounts of data; protect personal data from loss, misuse, unauthorised access and disclosure and ensure that appropriate technical measures are in place to protect personal data.

Like most organisations, we need to handle 'personal information' to do our work. All we mean by 'personal information' is a way of speaking about any information about you, that is either linked to you or could be used to identify you. So, in our situation, that could mean your name and contact details, details of any donations that you have made to us, bookings for activities run by Sportily, consent information for young people who attend our activities, for example.

If you have expressed interest in our work, are part of our groups and activities, are a supporter of our work, or we think that you might be interested we may use your personal information send you information about what we are doing. If you want us to stop doing this, you can click the 'unsubscribe' link at the bottom of every email, or contact us to request this.

We want to offer you a good service, so if you want to update your contact details (e.g. email or postal address) or change the way that we communicate with you, please contact us.

2. The legal basis for processing your personal data

Sportily will keep personal information up to date; store and destroy information securely; not collect or retain excessive amounts of data; protect personal data from loss, misuse, unauthorised access and disclosure and ensure that appropriate technical measures are in place to protect personal data.

The specific legal bases against which Sportily will process information are

- › Legitimate Interest
- › Compliance with a legal obligation
- › To fulfil contractual obligations
- › Consent
- › Vital interest
- › Public task

Most of our data is processed because it is necessary for Sportily's legitimate interests, or the legitimate interests of a third party. Some of the data processing is necessary for compliance with a legal obligation. In determining whether an activity is justified by our legitimate interests, we consider various things including the impact of the activity on people's privacy. Our legitimate interests include making people aware of our work, encouraging people to support our work (including financially), safeguarding the employees, workers, trustees, volunteers and young people/children taking part in Sportily activities, keeping in touch with those who support us, and understanding how people relate to us so that we can improve our work.

Sportily will process data if it is necessary for the performance of a contract with you, or to take steps to enter into a contract.

Sportily will process your data in order to respond to requests from you to receive particular information.

Religious organisations are also permitted to process information about your religious beliefs to administer membership or contact details.

3. Personal information: what it is, and why we process it

Personal information relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in Sportily's possession or likely to come into such possession.

Personal information is collected where Sportily believes it has lawful reason for us to do so.

Whose personal information do we collect?

We may hold some personal information about you, if:

- › You have asked us to keep in touch with you and tell you about our work;

- › You have donated to us;
- › You attend one of our activities;
- › You have attended an event run by Sportily e.g. a residential;
- › You have expressed interest in Sportily, or we think that you might be interested in Sportily;
- › You visit our website.

What do we use personal information for?

- › For the purposes of sending you/keeping you informed of news/information which you have requested and that may be of interest to you including campaigns, activities, fundraising activities.
- › For the purposes of administering meetings and other such arrangements and which ensure we are able to meet all legal and statutory and legal obligations.
- › To seek your views or comments.
- › To keep in touch with supporters of the charity
- › To manage Sportily employees, workers and volunteers (including HR records and payroll and pension requirements and records).
- › To process a grant or application for a role
- › To maintain Sportily accounts and records (including the processing of gift aid applications)
- › To maintain Sportily required records of mandatory training with regard to safeguarding, and other safeguarding and personnel records as set out in law and the Church of England's national requirements.
- › To manage safeguarding including DBS and safer recruitment, working with individuals within a safeguarding context; and within statutory and legislative requirements.
- › To carry out comprehensive safeguarding procedures (including due diligence and complaints handling) in accordance with best safeguarding practice from time to time with the aim of ensuring that all children and adults-at-risk are provided with safe environments;
- › To fundraise and promote the interests of the charity;
- › To notify you of changes to our services and offices.
- › To maintain registrars, emergency contact details and medical information for children and young people with attend our clubs or attend our events.
- › For approaching those whom we think might be interested in Sportily.
- › To process and saying thank you for donations.
- › To promote and report back on our work (e.g. we might feature children or young people we work with in a newsletter).
- › To operating and improve our communications.

What personal information do we use?

- › Name and contact details: For most purposes, we need people's name and contact details. These contact details usually include a postal address and / or email address and sometimes a phone number.
- › Interests, preferences and permissions: We may record and use information about what areas of our work you may be most interested in, a church you belong to and about how you would like us to contact you (including any permissions you have given). We may also make a note of previous action that you have taken (e.g. trips

you have attended, club you belong to) so that we can tell you about similar opportunities in the future.

- › Where they are relevant, or where you provide them to us, we may process demographic information such as gender, age, date of birth, marital status, nationality, education/work histories, academic/professional qualifications.
- › Donation details: If you're kind enough to donate to us, we will record and use information about your giving (e.g. amount, date, frequency) and your Gift Aid status. In some cases, we may record and use bank details (e.g. to help setup and check a Standing Order arrangement). We do not hold credit or debit card information.
- › Other contributions: If you attend groups or trips run by Sportily or raise funds, we may ask if we can feature you and your contribution in our communications. If so, we may hold and use testimonials, image and video material.

4. How we collect personal information

The data we process is likely to constitute sensitive personal data because as a faith based organisation the fact that we process your data at all may be suggestive of your religious beliefs. Where you provide this information, we may also process other categories of sensitive personal data: racial or ethnic origin. And, where this is relevant, mental and physical health, details of injuries, medication/treatment received, and criminal records, fines and other similar judicial records.

We collect and record personal information (i.e. information about you and your relationship with us) in various ways, including:

From you:

- › You may give us information **directly** – for example, if you write, call or email us asking for more information about Sportily and you give us your name and address, or you contact us say that your address has changed;
- › You complete consent forms for trips or attend an activity we run;
- › You volunteer for Sportily so complete an application form, volunteering agreement and DBS request;
- › You may give us information **indirectly** – for example, if you donate to Sportily via JustGiving or Stewardship, those organisations may pass on your name and contact details if you want them to.

From observing your interactions and relationship with us:

- › We may keep a note of our actions – for example, if we send you a receipt or thank you letter for a gift;
- › We may keep a note of your actions – for example, or you send us a donation, or register for attendance at an activity;
- › We may also collect some information electronically – for example, when we send emails via CharitySuite, we may receive some information about how you engage with our emails.

From other sources:

We may collect personal information in person, using paper forms, over the telephone, via email, online, or using other means. To help us collect information, we may use systems provided by other organisations (e.g. we may use CharitySuite to enable you to sign up to receive our emails).

5. Sharing personal data

We don't sell or rent your personal information to anyone else. Personal data will be treated as strictly confidential and will only be shared for lawful purposes and connected to the following circumstances:

- › **Third-party services:** We use a small number of third-party organisations to help us operate. For example, we use CharitySuite and Brevo to send emails about our work. To enable this, we share some personal information (e.g. name and email address). We also use an external provider for payroll, process DBS requests and process online bookings for events.
- › **Third-party providers:** We use a number of third-party sport and activity service providers to support us in delivering our work. These providers are appointed with Contract for Service agreements in place which prohibit the provider from taking copies of Sportily's data without permission. These providers are granted access to information to enable them to safely perform the duties of their contract, but data is not transferred to them nor are they acting as data processors.
- › **Promotion of our work:** If you benefit from our work by taking part in our activities or contribute in a certain way then we might want to tell others about you and what you have done, or about how you have benefitted. But we would only do this with your permission.
- › **Partners:** Sportily works in partnership with local churches where information and photographs will be shared with the local church. We also partner with Scripture Union and are a subsidiary charity of the Diocese of Gloucester. Permissions are sought for sharing photos and videos with these partners using consent forms.
- › **Legal or regulatory obligations:** In some circumstances, we may share personal information if need to comply with legal or regulatory obligations. For example, we might need to demonstrate to HMRC that we are claiming Gift Aid legitimately or there is a safeguarding concern. Where there are employment, social security or social protection, or other statutory reasons.

6. Keeping personal data

The length of time we will retain data depends on what the information is and why we have it. We keep all information in line with our data protection policy.

Sportily keeps data in accordance with the guidance and requirements set out in law and statutory guidance, and by the national Church of England e.g. with regards to safeguarding. Specifically, we retain personnel information as appropriate to employees, workers and

volunteers, safeguarding data; financially required data e.g. by HMRC, and the Charity Commissioners; gift aid declarations and associated paperwork.

We hope to have long term relationships with our participants, supporters, young people and their caregivers, and be in regular contact so we'll keep and use your personal information whilst the relationship is active.

If the relationship becomes inactive, we may keep the information for a time, in case the relationship is reactivated. If you ask us to stop contacting you, we may need to keep some information so that we can honour your wish.

There is some information that we have to keep for certain periods of time. For example, donation, human resources and safeguarding details.

How do we keep your personal information safe?

We take steps to secure your personal information, and regularly review our approach with proper controls for paper and electronic records.

When we use [other organisations](#) to help us provide services (e.g. CharitySuite and Brevo for sending emails, The Diocese of Gloucester and ThirtyOneEight for processing DBS requests), we ensure they are also GDPR compliant.

We should also remind you that no internet communication or internet-connected storage can ever be guaranteed to be completely secure.

7. Individual rights and personal data

Under data protection legislation, you have various rights, including the right to see what personal information we hold about you.

You have a number of rights including:

- › to be informed about how we use your personal information;
- › to see what personal information we hold about you and know how it is used;
- › to correct inaccurate or incomplete information that we hold;
- › to ask us not to use your personal information in certain ways. For example, you can ask us to stop sending you our postal mailings;
- › to ask us to delete your personal information if we have it;
- › where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- › at any time to withdraw your consent to our processing of your personal data.

You also have other rights, including the right to complain.

There are some circumstances in which these rights don't apply. If you wish to exercise any of these rights, please contact us in writing. We usually need to comply with your request within one month of receiving it. We may need some information from you to ensure that we can identify you.

How do we keep you informed about your privacy?

We regularly review our approach to privacy and the use of personal information and will keep this page on our website up to date. If we make any changes that are likely to have a

significant impact on your privacy, we may email you (if we have your permission) or include information in a postal mailing, to keep you informed.

How do you complain?

We try hard to protect and respect your privacy, so we really hope that you don't have cause to complain. But if you are unsure or unhappy about something, please contact us.

You also have the right to complain to the [Information Commissioner's Office](#) (ICO). You can complain to the ICO without contacting us first, if you wish.

8. Further processing

If Sportily wishes to use your personal data for a new purpose, not covered by this Privacy/Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

9. Our email communications and website

Email updates, and the use of personal information?

If you have given us your consent, we may send you emails about us and our work. You may remove your consent at any point. You can do this by clicking the 'unsubscribe' link at the bottom of the messages that we send, or you can contact us.

We currently use CharitySuite and Brevo to send emails. To do this, we share personal information with these services, including your email address. You can read more about this on their websites. We may use your personal information to determine which email messages to send you.

External links

If you click on a link in one of our emails that takes you to a website that is not operated by us, then your use of that site (and any information that is collected from you or about you) is governed by that website's privacy policy and is not our responsibility.

Our website, and the use of personal information?

Our website is maintained and hosted by a third-party provider. This organisation may have access to information provided by you through our website. The on-line booking via our website is processed by an external provider and they are responsible for ensuring the payment details you provide is kept secure.

Information provided by you

If you visit our website, you may choose to submit information to us via the 'contact us' form. This information will be transmitted to us but it may not be encrypted in the process so you should be careful about what information you submit. For example, please do not transmit any financial information in this way. We treat information submitted via our webform in the same way as information that we receive via other means (e.g. by email), in

accordance with the principles that we have set out above. A copy of the information that you submit may be kept on the web server. Keeping a record of this information in this way, can help us if there is any problem with the information reaching us.

Information collected about your visit to our website

Like other websites, when you visit our website, we (and others) collect some information about your visit.

This is often called 'usage data' and refers to information about how our website is accessed and used. It may include information such as your internet browser type (e.g. Google Chrome), browser version, your Internet Protocol (IP) address, the date and time of your visit, which pages you visited and how you arrived at the website.

We (and/or our suppliers) may use this information to:

- › Operate the website and improve your immediate experience of it (for example, on some parts of the website we might use larger text if you are using a small screen such as a mobile phone)
- › Analyse how people arrive at our website and what action they take, so that we can make the website easier to use and improve people's experience in the future
- › Protect our website and the information contained

Certain information (such as your IP address) is needed by the web-server to provide the web pages that you have requested.

Information such as the browser and the type of device that you are using can help us to provide web content to you in the best format.

'Usage information' may be stored in log files on the web server, as this may help to troubleshoot problems, and improve the security and performance of the website in the future. If you would like to know more about what happens to this information, please contact us.

Cookies

We also use cookies on our website. Cookies are small computer files that may contain data such as an anonymous, unique identifier. Cookies are sent to your browser from a website and stored on your device. These cookies may be set by us, or by third-parties that we use to provide you with content (e.g. to play a video).

The cookies we have identified on our website include "Google Analytics – cookies to track how you use the website in order to improve the usability of the website"

Additional cookies may be set if you log in to our website. Only website editors log in to our website however and they will be informed in other ways.

Third-party cookies and tracking technology

Where we 'embed' content hosted by another organisation (e.g. if we 'embed' a video that is hosted by YouTube, so that you can watch it on our website), then it is possible that those third-party organisations will use cookies or other tracking technology to provide this functionality and / or for their own purposes (which may include tracking and analytics). In this scenario, we don't control how these organisations use this technology, and you should their privacy policy for more information.

Controlling cookies and tracking technology

You can find out more about cookies and how you may be able to disable them, here: <http://www.allaboutcookies.org/>

You can disable various tracking technologies and opt out of the collection and use of information for advert tracking. You can find more information about this at <http://www.aboutads.info/choices> or <http://www.youronlinechoices.eu/>

Our collection of 'usage data'

We do not knowingly attempt to match any of the 'usage information' that we collect on our website, with your name or contact details.

External links

If you click on a link on our website that takes you to another website, then your use of that site (and any information that is collected from you or about you) is governed by that website's privacy policy and is not our responsibility.

10. Gathering information from external sources

Sportily may from time to time undertake research to enable it to develop its work. Any information, whether personal or of a quite general nature, will be from publicly available sources such as Companies House, information published in articles/papers etc, social media which is viewed publicly through the privacy notices of social media and messaging services e.g. LinkedIn; or through national and regional bodies or authorities information such as the census data.

11. Data processors

As explained above, we use some third-party organisations to help us achieve our aims and provide the services that we do. Their use of your personal information is governed by our agreement with them and by their own privacy policy. We keep a full Record of Processing Activities regularly reviewed and updated. Below are some of our core third party data processors:

- **CharitySuite and Brevo:** used to send communications to interested parties and to manage contact information for participants, supporters and volunteers, and process donations to the charity, processed through Stripe;
- **BookWhen and TeamUp:** used to arrange memberships and bookings for activities and send marketing communications and information about bookings. Payments are processed through Stripe;
- **Outsourced IT Provider:** provide IT support including logging on remotely to resolve IT issues;
- **BreatheHR:** used to manage employee and worker records;
- **The Diocese of Gloucester:** process DBS checks for us and support us with safeguarding advice and case management through a Service Level Agreement;
- **Website** – maintained by an external provider.