

SPEEN PLAYING FIELDS

PRIVACY POLICY

We at the **Speen Playing Fields** (“we” or “our” or “us”) want to make sure all the personal information we have collected about you, is safe and secure. This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store and use your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Secretary has overall responsibility for data protection compliance in our organisation. If you have any questions about this Policy or what we do with your personal information, their contact details are set out in the "**Contact Us**" section below.

PRIVACY NOTICES

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services you may request from us or in providing services to our customers and members or just managing our relationship with you.

When we hold or use your personal information as a **data controller** (*see below for a description of what this is*) we will provide you with a privacy notice which sets out in detail what information we hold about you (such as your contact details, address, etc.), how your personal information may be used and the reasons for these uses, together with details of your rights.

Where we collect personal information from you directly, we will provide this privacy notice at the time we collect the personal information from you. Where we receive your personal information indirectly, we will provide this privacy notice when we first contact you, first pass the data to someone else or within a month, whichever is the earlier.

We will only provide this privacy notice to you once, generally at the start of our relationship with you. However if the applicable privacy notice is updated substantially, then we may provide you with details of the updated version. You are encouraged to check back regularly for updates.

THE DIFFERENCE BETWEEN DATA CONTROLLERS/PROCESSORS

A data controller is a person who controls how personal information is processed and used. A data processor is a person who processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller.

This distinction is important. You have certain rights in relation to your personal information, for example the right to be provided with the personal information held about you and details of its use and the right to have certain of your personal information either erased or anonymised, commonly referred to as the right to be forgotten (*see below to see what rights you have*). These rights can generally only be exercised against a data controller of your information.

In most cases we will be a data controller of your personal information. In any case where we are not a data controller this means that you cannot exercise these rights against us directly (i.e. where we only act as a data processor), but you can do so against the data controller (i.e. the person who controls how we process the personal information). In these cases we will endeavour to inform you who is the data controller of your personal information so that you can direct any such requests to them.

Also it is only a data controller that will provide you with a privacy notice about your personal information, so where we process your personal information as a data controller we will provide you with a privacy notice. Where we process your personal information as a data processor for a third party, that third party should provide you with a privacy notice which will set out details regarding the processing of your personal information, which should also include the processing to be carried out by us on their behalf.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We will use your personal information as described in the privacy notice provided to you, but, for example, we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy

to be contacted for these purposes. To see how we use your personal information, please see the PF Privacy Notice, in Appendix A.

WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

Details of how we disclose your personal information are set out in the relevant privacy notice provided to you, but generally it is where we need to do so in order to run our organisation (e.g. where other people process information for us). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

If we transfer personal information about you outside the European Economic Area (EEA), we will let you know and ensure that all reasonable security measures are taken and that any third party processors will be required to process the information in accordance with information protection laws and we will notify you in your privacy notice if we are the information controller.

We do not sell, trade or rent your personal information to others.

HOW LONG DO WE HOLD ON TO YOUR PERSONAL INFORMATION?

Further details of how long we hold onto your personal information for are set out in the relevant privacy notice provided to you, but we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier.

The duration for which we retain your personal information will differ depending on the type of information and the reason why it was collected. However, in some cases personal information may be retained on a long term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

WHAT ARE YOUR RIGHTS?

Full details of your rights set out in the relevant privacy notice provided to you, but you are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contact**" section below. You can also unsubscribe from any **direct marketing** by clicking on the unsubscribe link in the marketing messages we send to you.

You should note that some of your rights may not apply as they have specific requirements and exemptions which apply to them and they may not also apply to personal information recorded and stored by us. However your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to help and would encourage you to contact us to resolve your complaint first.

SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

CHANGES TO THIS POLICY

Any changes we may make to this Policy in the future will be posted on our Site and, where appropriate, notified to you by e-mail. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in the "**Contact Us**" section below.

CONTACT US

In the event of any query or complaint in connection with the information we hold about you, please email **playingfields@speenbucks.org.uk** or write to us at Speen Playing Fields, Hampden Road, Speen Bucks HP27 0RU

Whilst this privacy policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

Version Date: 25 November 2018

APPENDIX A – SPF PRIVACY NOTICE

SPEEN PLAYING FIELDS

PRIVACY NOTICE FOR SUPPORTERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice are to **Speen Playing Fields, Hampden Road, Speen, registered Charity No. 300331**.

A **supporter** is an individual who; makes charitable donations to us or, participates in our Monthly Draw, or attends one of our events, or volunteers to provide maintenance services to us.

We have **not** appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Secretary has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contact Us" section at the end of this privacy notice.

1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of support you provide to us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, address, email addresses and telephone numbers;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form obtained at our events;

2. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about you when you give financial support to our activities, attend our events, participate in our Monthly Draw or when you correspond with us by phone, e-mail or in some other way.

3. **USES MADE OF THE INFORMATION**

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal Information Processed	Lawful Basis For Processing
To administer our Monthly Draw	Personal contact information, payment information and records of your winnings (if applicable)	This is necessary to enable us to properly manage your membership of our Monthly Draw
For the purposes of promoting Speen Playing Fields and our events.	Personal contact information and images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To administer your attendance at our events	Personal contact information and records of payment.	This is necessary to enable us to register you on and administer your attendance at our events.

To answer your queries or complaints	Personal contact and records of your interactions with us	We have a legitimate interest to respond to complaints.
Retention of records	All the personal information we collect.	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage our Monthly Draw.</p> <p>We will not retain any personal information after such time that you have requested for your data to be erased from our records.</p>

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by Contact us as described in the "Contact us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

4. **DIRECT MARKETING**

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about fund raising and events we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by Contact us as described in the "Contact us" section below.

5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

6. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

7. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial

practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period 12 months after your last contact with us.

Exceptions to this rule are:

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you by using the details set out in the "**Contact us**" section below.

8. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contact Us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

9. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. **CONTACT US**

In the event of any query or complaint in connection with the information we hold about you, please email playingfields@speenbucks.org.uk or write to us at Speen Playing Fields, Hampden Road, Speen Bucks HP27 0RU

Version dated 25 November 2018