

CARSHALTON ATHLETIC ACADEMY

GDPR, Privacy Statement & Data Protection Policy

Carshalton Athletic understands that the privacy of individuals is important as people care about how their personal data is used. We respect and value the privacy of all of our Customers, Students, Employees and Business Contacts and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and their rights under the law.

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Under the GDPR, individuals have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell an individual everything they need to know, but they can always contact us to find out more or to ask any questions.
- b) The right to access the personal data we hold about them.
- c) The right to have their personal data rectified if any of their personal data held by us is inaccurate or incomplete by contacting us in writing either via email at academy@carshaltonathletic.co.uk or by writing to us at Carshalton Athletic FC, War Memorial Sports Ground, Colston Avenue, Carshalton, SM5 2PW.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of their personal data that we have.*
- e) The right to restrict (i.e. prevent) the processing of their personal data.*
- f) The right to object to us using their personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if they have provided personal data to us directly, we are using this with their consent or for the performance of a contract, and that data is processed using automated means, they can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. We do not use their personal data in this way.

Further information about an individual’s rights can also be obtained from the Information Commissioner’s Office or the local Citizens Advice Bureau.

If an individual has any cause for complaint about our use of their personal data, they have the right to lodge a complaint with the Information Commissioner’s Office. We may collect some or all of the following personal data (this may vary according to their relationship with us):

- Name;
- Date of birth;
- National Insurance Number;
- Gender;
- Address;
- Email address;
- Telephone number;
- Business name
- Job title;
- Payment information;
- Information about their; preferences and interests; attendance, products and services; educational achievement and learning goals;

The following sensitive information may also be collected;

- Ethnicity, race and sexuality;
- Health, fitness and disability;
- Family and medical history;
- Household income;
- Lifestyle;
- Dependents;
- Criminal convictions

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with an individual, because they have consented to our use of their personal data, or because it is in our legitimate business interests to use it. Personal data may be used for one of the following purposes:

- Supplying our products AND/OR services to the individual. Their personal details are required in order for us to enter into a contract with them.
- Personalising and tailoring our products AND/OR services for them.
- Communicating with an individual. This may include responding to emails AND/OR calls from them.
- Supplying an individual with information by email AND/OR post that they have opted-in to (they may unsubscribe or opt-out at any time by contacting us).
- Compliance with public funding regulations and guidance.

With an individual's permission and/or where permitted by law, we may also use personal data for marketing purposes, which may include contacting them by email AND/OR telephone AND/OR text message AND/OR post with information, news, and offers on our products AND/OR services. They will not be sent any unlawful marketing or spam. We will always work to fully protect an individual's rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and an individual will always have the opportunity to opt-out.

We will not keep personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Personal data will therefore be kept for the following periods (or, where there is no fixed period, the following factors will be used to determine how long it is kept) in compliance with official guidance, best practice and legal obligations.

We will only store or transfer your personal data in the UK. This means that it will be fully protected under the GDPR.

We may share personal data with other companies in our group for the effective delivery of our products and services. This includes subsidiaries AND/OR our training provider and its subsidiaries.

- We may sometimes contract with the following third parties to supply products AND/OR services to an individual on our behalf. These may include payment processing, delivery, and marketing. In some cases, those third parties may require access to some or all of their personal data that we hold.
- JACE Training and the Education and Skills Funding Agency for access to public funding for students. The Education & Skills Funding Agency is a public body that funds qualifications and training that an individual may be receiving. It is responsible for maintaining ULNs and Personal Learning Records on behalf of all individuals aged 13 and above in England, Wales and NI.
- Local Authorities for access to public funding and student support.
- Awarding organisations for registration and certification.
- The football Association and league associations

If any personal data is required by a third party, as described above, we will take steps to ensure that personal data is handled safely, securely, and in accordance with the rights of the individual, our obligations, and the third party's obligations under the law.

In some limited circumstances, we may be legally required to share certain personal data, which might include a particular individual, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

If an individual wants to know what personal data we have about them, they can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

All subject access requests should be made in writing and sent to the following email or postal addresses.

Email: academy@carshaltonathletic.co.uk

Address: Carshalton Athletic FC, War Memorial Sports Ground, Colston Avenue, Carshalton, SM5 2PW.

There is not normally any charge for a subject access request. If a request is ‘manifestly unfounded or excessive’ (for example, if repetitive requests are made) a fee may be charged to cover our administrative costs in responding.

We will respond to a subject access request within twenty eight days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of any personal data within that time. In some cases, however, particularly if a request is more complex, more time may be required up to a maximum of three months from the date we receive a request. An individual will be kept fully informed of progress.

To contact us about anything to do with personal data and data protection, including making a subject access request, please use the following details:

Email: academy@carshaltonathletic.co.uk

Address: Carshalton Athletic FC, War Memorial Sports Ground, Colston Avenue, Carshalton, SM5 2PW.

How can I opt out of receiving marketing information?

If an individual wishes to opt out of receiving marketing information from Carshalton Athletic, they should contact our Senior Administrator using the above contact details, stating that they no longer wish to receive marketing information. We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.

Personal Learning Record Privacy statement

Some of the information an individual supplies will be used by the JACE Training and Skills Funding Agency to fulfil its statutory functions, issue and/or verify a Unique Learner Number (ULN) and up-date and/or check their own Personal Learning Record (PLR).

- A Personal Learning Record will include information about an individual's qualifications, awards, training and learning achievements that they may collect throughout their lifetime – at all levels and also whilst they are working and learning.
- A Personal Learning Record can be shared with organisations who have a responsibility for providing, funding and serving an individual's education and training.
- If an individual is below the age of 16, they might wish to discuss this with their parent or legal guardian.
- The Skills Funding Agency is a public body that funds qualifications and training that an individual may be receiving. It is responsible for maintaining ULNs and Personal Learning Records on behalf of all individuals aged 13 and above in England, Wales and NI.
- The Unique Learner Number (ULN) is a ten digit reference number and is unique and individual for use within education.
- The Skills Funding Agency may obtain and use third party reference data to assist when verifying a ULN and when checking that the data it holds is correct, in order to comply with the requirements of the Data Protection Act to keep details accurate and up to date.
- JACE Training and The Skills Funding Agency may use information for management and statistical purposes and for monitoring the accuracy of the information it holds about an individual.”
- JACE Training and The Skills Funding Agency may share a ULN and Personal Learning Record information with other education related organisations, such as careers service, school, college, university, Government Departments and public bodies responsible for funding an individual's education.
- Please note that an individual **can opt-out** of the Skills Funding Agency sharing Personal Learning Record. However, they cannot opt-out of the Skills Funding Agency storing their information.
- An individual can opt-out of sharing your participation and achievement data by contacting the LRS Customer Helpdesk on 0845 602 2589. You will be required to provide some personal details to confirm identify, which may include the Unique Learner Number (ULN), if known

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