

REAL FC LTD PRIVACY STATEMENT

Our privacy statement relates to the details we ask for when you use the Real FC website.

Like all organisations who collect and use personal data, Real FC is subject to the requirements set out in the General Data Protection Regulation ('GDPR'). We take our responsibility to look after personal data very seriously and we ensure that respecting privacy is at the heart of all we do. Our privacy statement explains how Real FC collects, uses and looks after personal data. Personal data is any information relating to an identified or identifiable living person. This definition of this may be found in the Data Protection Act 2018.

We have adopted an approach across the organisation to help ensure that we consider the privacy implications of all our projects, and day-to-day work.

THE DATA PROTECTION PRINCIPLES

The GDPR includes six principles that organisations must apply when they collect and use personal data. These principles are:

- Personal data must be processed in a manner, which is lawful, fair and transparent. This means that when we collect and use personal information we must have a lawful basis for doing so, we must consider the rights and interests of the person the data is about, and provide clear information about our use of the data.
- Personal data must be collected for specified, explicit and legitimate purposes and not used in any ways, which are incompatible with those purposes. When we collect personal data we must be very clear about why we need it and what we do with it. If we collect personal data for one purpose, we may not use it for an unconnected purpose.
- Personal data we collect must be adequate, relevant and limited to what is necessary for the purposes for which it is used. This means that we must make sure we only collect and use personal data that is strictly necessary for our stated purpose or purposes.
- Personal data must be accurate, and where necessary, kept up to date. We are required to take all reasonable steps to ensure that the personal data held is correct and kept up to date. This means that from time to time, we will review the personal data we hold and we may contact you to make sure the personal data we have about you is current and does not contain any errors.
- Personal data must be kept in a format, which allows identification for no longer than is necessary for the purposes for which it is used. In some cases, it may only necessary for us to be able to directly identify an individual for a short period of time. When we no longer need to be able to identify an individual we will anonymise the personal data. Where personal data is anonymised and the data subject is no longer identifiable that data will cease to be personal data.
- Personal data must be used in a manner that ensures appropriate security of the data. This means that our policies, procedures, systems and working practices must ensure that personal data is protected from unlawful access and is kept secure at all times.

LAWFUL BASIS

Before we collect and use personal data, Real FC must be able to demonstrate that there is a lawful basis for us to do so. GDPR provides six lawful bases for processing personal data:

- Consent: when you have explicitly told us that we may collect and use your personal data – for example by asking us to add you to one of our mailing lists.
- Contract: when we need to collect and use personal data to enter into or perform a contract – for example if you sign your child to play for us during the season.
- Legal obligation – when we need to collect and use personal data to carry out our legal duties – for example to respond to a request for information under the Freedom of Information Act.
- Vital interests: when we need to collect and use personal data to protect your vital interests or the vital interests of another person – for example by contacting the relevant authorities if we believe an individual is likely to come to immediate harm.
- Public task: when we need to collect and use personal data to carry out one of our official tasks, or a task that is in the public interest.
- Legitimate interests: when we need to collect and use personal data to pursue the legitimate interests of Real FC or a third party, unless doing so would interfere with your rights and freedoms.

Our lawful basis for collecting and using personal data varies depending on why we have collected it and what we will do with it. Whenever Real FC collects personal data directly from you we will set out our lawful basis as clearly as we can directly with links to the information you need. If we receive personal data about you from a third party, we will use reasonable efforts to identify our lawful basis where it is possible and practical for us to do so.

WHY WE NEED TO COLLECT PERSONAL DATA

Real FC collects and uses personal data for a variety of purposes including:

- Staff selection and recruitment
- Being able to carry out DBS checks on staff and volunteers
- To ensure we have suitable contact information from parent/carers on any child under our care
- Marketing new courses and activities via our mailing lists
- Responding to correspondence from members of the public
- Being able to suitably manage all players registered to the Club over the season
- Complying with regulatory and financial requirements

When we collect personal data directly from you, we will provide specific and detailed information about why we need to do so.

ABOUT THE PERSONAL DATA WE COLLECT AND USE

Real FC collects the following personal data:

- Names and contact details (including postal and email addresses and telephone numbers)
- Names of children and dates of birth along with parent/carer contact details (as above)

- Information about ethnicity, health related data or other special category personal data where it is necessary and relevant for a specific purpose.

When we collect and use personal data directly from you, we will provide specific and detailed information about the categories of personal data involved.

COLLECTING PERSONAL DATA ABOUT CHILDREN

We do not collect any contact details in regards to children or players under the age of 18. All information and details we store are of the parent/carer.

HOW WE SHARE PERSONAL DATA

Relevant Real FC colleagues, suppliers and subcontractors will have access to your personal data for the purpose(s) it was collected for. When suppliers and subcontractors have access to your personal data, Real FC will still be responsible for decisions about how your personal data is used.

If we are required by law to disclose personal data we will do so, in keeping with our obligations.

Real FC never sells personal data to third parties for any purpose, and we do not collect or compile personal data for dissemination to third parties for marketing purposes.

HOW WE LOOK AFTER YOUR PERSONAL DATA

Personal data is held securely within Real FC's IT environment. Where personal data is held on paper this is stored in a secure location. After use this is shredded before being disposed of.

HOW LONG WE KEEP PERSONAL DATA

We do not keep personal data for longer than is necessary for the purpose(s) it was collected for. Once your data has served it's purpose it was collected for it will be deleted.

YOUR RIGHTS

The GDPR gives individuals a number of rights in relation to any personal data an organisation holds about them and it is Real FC's policy to make it as easy as possible for people to exercise these rights.

Subject access

Under GDPR all individuals are entitled to be told what personal data an organisation holds about them, and to receive copies of that information, free of charge, within one month.

You can make a subject access request to Real FC by contacting the Managing Director: info@realfc.co.uk

Rectification and erasure

If you believe that Real FC is holding inaccurate information about you, you are entitled to ask us to rectify that data. In addition, if you believe that Real FC no longer has a lawful basis to use your personal data, you can ask us to delete it.

The right to rectification and erasure is not absolute, but we will consider any requests carefully and comply with such requests where it is appropriate for us to do so. You can ask to have your personal data rectified or erased by contacting the Managing Director: info@realfc.co.uk

Withdrawing consent

If our lawful basis for collecting and using your personal data was consent, then you are entitled to withdraw that consent at any time. You do not need to give a reason for withdrawing your consent and

we are required to comply promptly. You can inform us that you wish to withdraw consent by contacting the Managing Director: info@realfc.co.uk

Complaints

If you are in any way dissatisfied with the way we have handled your personal data, Real FC provides a Complaints Procedure. In addition you are entitled to lodge a complaint about our data handling practices with the Information Commissioner by writing to:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

CHANGES TO OUR PRIVACY STATEMENT

We keep our approach to privacy under close review, and this means we may update our Privacy Statement from time to time. Updates to the Privacy Statement are published on our website.