



## London Sport Privacy Policy July 2018

London Sport is committed to ensuring your privacy is protected and that all collected personal data is safeguarded and processed in accordance with applicable privacy laws.

This policy describes how we use and process personal data about you, however it is provided to us, and your rights to it. ***Please read this policy carefully.***

We may from time to time update this policy. It is recommended that you frequently check this document for any changes that may occur, but we will also notify you of significant changes where we have your contact details and it is reasonably possible for us to do so.

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### 1. Who we are

London Sport (“**London Sport**”, “**us**” or “**we**”) consists of the charitable company London Sport (registered charity number 1165100) and London Sport Trading Limited (company number 9926559), the charity’s wholly owned subsidiary. Both component parts are controllers of your personal information and personal information may be shared internally to achieve the purposes set out in this policy.

### How and why we use your personal information

At all times in accordance with the relevant legal principles\*, London Sport may use your personal information for the following purposes:



- A. To perform the services or information you have requested, which may involve contacting you electronically, by post and/or over the phone, and to accommodate your participation in events.
- B. To manage relationships with our partners and stakeholders and communicate with you in general.
- C. To allow London Sport to perform its duties effectively and further its charitable aims in general, including to provide services to its beneficiaries, for instance by supporting funding applications or developing participation insight (including conducting surveys and research).
- D. To run/ administer our websites and online tools including facilitating user friendly features.
- E. For the reasonable purposes of London Sport, including to analyse and improve our work, services, activities, products or information or for our internal administration.
- F. To market to you London Sport and selected third party products, work, activities and services, and for other purposes you may have consented to when submitting your personal information.
- G. To administer employment with us, including considering applications.
- H. To satisfy legal obligations binding on us, for example in relation to regulatory, government and/ or law enforcement bodies, and to satisfy contractual requirements we have (for example with third party funders such as Sport England).
- I. For the detection of fraud or misuse of services, and for the establishment, defence and/ or enforcement of legal claims.
- J. For market research purposes.
- K. To provide services to partner organisations – for example we will collect personal information in order to assist partners with writing funding bids or to produce insight reports (which include us conducting a piece of research/ analysis for a partner organisation).

**\*Lawful basis**

Data privacy law requires us to rely on one or more lawful basis to process your personal information. The following are relevant to us:

- Where you give **consent** (for example, to receive email updates).



- We have entered into a **contract** with you or taken steps at your request prior to entering into one.
- Where necessary to comply with a **legal obligation** to which we are subject.
- Where there is a **legitimate interest** in us doing so, provided our use is fair, balanced and does not unduly impact on your rights and freedoms.

#### Our legitimate interests

Depending on the activity, we may be relying on our legitimate interests or those of our partner organisations. Those legitimate interests include the following:

- Charity Governance, including delivery of charitable purposes;
- Administration and operational management, including responding to solicited enquires, providing information, research, donor due diligence, events management, the administration of our Projects and employment and recruitment requirements; and
- Campaigning and research, including administering campaigns and sending material by post.

In general, our legitimate interests include running the Foundation as a charitable entity and pursuing our aims and ideals. However, “legitimate interests” can also include your interests, such as when you have requested information or services from us, and those of third parties (for example, beneficiaries of our project work).

## 2. Communicating with you

We may use your contact details to provide you with information about our work, including our events, campaigns, research and project work, which we consider may be of interest to you. We will obtain your consent to do so by email. We may send you postal communications on the basis of it being in our legitimate interests.

We may, on occasion, collect additional personal information from you, including via surveys, which you will be under no obligation to fill in or return to us. The details you provide will enable us to provide information about our work to you and to contact you by email or text. We will only provide this when you indicate that you wish to receive such information from us on this basis.

You can opt out of receiving such information at any time by contacting us at [hr@londonsport.org](mailto:hr@londonsport.org).

We may continue to send you communications without consent where they are for purposes unrelated to marketing/ campaigning, i.e. when they are administrative only.



### 3. The types of information we collect

The personal information we collect may include:

- A. **Identity data** such as your name, date of birth, and other sensitive personal data.
- B. **Contact details** such as your address, email address and telephone number.
- C. **Financial data** such as bank account and payment card details.
- D. **Technical data** such as IP address and details of your device and interactions with our websites.
- E. **Biographical information** such as that you provide in survey responses, and details of and derived from your interactions with London Sport.
- F. **Marketing and communications** preferences and your interests, including sporting interests.
- G. Any other information provided to us as per Section 4 below.

We also collect, use and share aggregated data such as statistical or demographic data, in particular in the course of our insight work. Aggregated data may be derived from your personal data but is anonymised so that it does not directly or indirectly reveal your identity.

#### Special category data

Data privacy law recognises some categories of personal information as sensitive and requiring more protection, for example information about your health, ethnicity and political opinions (referred to as '**special category data**'). In certain situations, we may collect and/or use these special categories of data, for example from participants in a project. We will only process these special categories of data if there is a valid reason for doing so and where the law allows us to do so, such as where we have consent.

### 4. Children's personal information

When we process children's personal information, where required we will not do so without their consent or, where required, the consent of a parent/ guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

### 5. How we collect information

London Sport uses several sources for the collection of personal information, which include:



- A. When you give it to us **directly**, for example via interactions with us such as in recruitment application forms, funding applications, and collection of personal information for projects including insight projects (e.g. in surveys) or from registering on our websites.
- B. When we obtain it **indirectly**, for example if it is shared with us by third parties including project partners (including our insight work which is explained more at [www.londonsport.org/consultancy-services/](http://www.londonsport.org/consultancy-services/)), sub-contractors or analytics providers. To the extent we have not done so already, we will notify you when we receive personal information about you from them and tell you how and why we intend to use that personal information.
- C. When it is available **publicly**. Your personal information may be available to us from external publicly available sources. For example, depending on your privacy settings for social media services, we may access information from those accounts or services (for example when you choose to interact with us through platforms such as Facebook, Instagram or Twitter).
- D. When you visit our **websites**, we automatically collect technical information, such as your IP address and information about your device, as well as information about your visit to the website and browsing patterns.

In general, we may combine your personal information from these different sources for the purposes set out in this Notice.

## 6. Social media/ digital

Depending on your settings or the privacy policies for social media messaging services like Facebook, Twitter and Instagram you may receive targeted advertisements about the Foundation through our use of social media audience tools. For example, Facebook's 'Custom' and 'Lookalike' Audiences' programmes enables us to display adverts to our existing supporters when they visit Facebook, or other people who have similar interests or characteristics to our supporters.

We may provide your personal information including your email address to Facebook, so it can determine whether you are a registered account holder with them, or so that Facebook create a "lookalike" audience. Our adverts may then appear when you access Facebook. We only work with social media networks that provide a facility for secure and encrypted upload of data and immediately delete any records not matching with their own user base. For more information or to manage your social media ad preferences, please see Facebook's "About Custom Audiences" guide (<https://www.facebook.com/business/help/744354708981227>) and its Data Policy (<https://en-gb.facebook.com/policy.php>).



You can opt out of our using your information for these purposes by contacting us at [hr@londonsport.org](mailto:hr@londonsport.org).

Our website also uses web beacons or pixels through third-party service providers that allow us to track conversions and activity on our website as well as generate advertisements that appear on Facebook and other search engines like Google for you and other potential users. Please see our Cookies Policy for more information.

## **7. Data sharing**

We will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies) or where your consent is obtained, and will only share your personal information otherwise as set out below.

### Suppliers

We provide your information to our contractors, suppliers and partners who provide services on our behalf, or with whom we collaborate, to the extent necessary to enable us to provide you services – provided we are satisfied that they provide sufficient guarantees in respect of safeguarding your personal information and privacy rights, and that we have in place an appropriate agreement with them. For example, communications about our work may be delivered to you by third parties.

### Partners

We work closely with various third party delivery partners to offer a range of sporting programmes for Londoners. When you enquire about, register and take part in any of these programmes, the delivery partner will in many cases be acting as the controller of your personal information and therefore we advise you to read their privacy policy. These partners may share your personal information with us (often in aggregated or anonymised form) which we will use in accordance with this privacy policy. If we will share your personal information with a partner organisation who will also be a controller, for example in our project work, we will notify you about this separately when we collect your personal information.

### Mergers

We may also need to disclose your information if we were to merge or undergo a reorganisation, in doing so we may acquire or transfer personal information as part of that transaction but your personal information would continue to be used for the same purposes.



## 8. International transfers

London Sport is UK-based, so in general the personal information we collect is stored within the UK. However, we may use suppliers (such as website hosts) to process personal information on our behalf that are based outside, and it is possible that personal information we collect from you will be transferred to and stored in a location outside the European Economic Area (“EEA”).

Some countries outside of the EEA have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. In these cases, we ensure adequate safeguards have been put in place to protect your personal information, such as European Commission-approved contracts or transferring to suppliers who are subject to the EU-US Privacy Shield framework. If you have any questions about the transfer of your personal information, please contact us using the details below.

Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure.

## 9. Gaining access to your personal data

London Sport tries to be as open as it can be in terms of giving people access to their personal information. You can find out about the personal information we hold about you by making a 'subject access request'. To do so please make your request to us at [hr@londonsport.org](mailto:hr@londonsport.org).

Your request should include proof of who you are (e.g. driving licence, passport, or birth certificate). You should also provide as much detail as possible regarding the information you wish to access (e.g. where and by whom information is believed to be held, specific details of information required etc.).

You are not required to state why you wish to access the information but you should include any details that will help us locate and retrieve the information.

## 10. Other privacy rights you have

Where we rely on your consent to use your personal information, you can **withdraw your consent** at any time. This includes the right to ask us to stop using your personal information for marketing purposes or to unsubscribe from our email list at any time. You also have the right to:

- A. **Object to the use** – you have the right to object to our use of your personal information where we are (i) relying on legitimate interests as our legal basis, (ii) using it for direct marketing or (iii) using it for statistical purposes.



- B. **Request erasure** – in some cases you can ask us to delete your personal information from our records (or anonymise it). We may retain some limited personal information so we can ensure you are not contacted by us in the future.
- C. **Request correction** – if you believe our records concerning you are inaccurate, you can ask us to update them. If you are unsure you can ask us to check the information we hold about you.
- D. **Request us to restrict processing** – you can ask for processing of your personal information to be restricted (i.e. held but not further used) if there is disagreement about its accuracy or legitimate usage.
- E. **Request transfer** – in limited circumstances, you can ask us to transfer your personal information to you or another party.

Some additional rights apply in respect of what is known as ‘automated decision making’ but London Sport does not currently use your personal information in this way.

Please note that these are legal rights which only apply in limited circumstances. For more information, or to exercise these rights, please contact us using the details below.

We may ask you for additional information, to confirm your identity, and for security purposes, before disclosing personal information requested to you.

## 11. How we keep your personal information secure

We are committed to keeping your personal information safe and secure and take appropriate and proportionate security policies and organisational and technical measures to help protect your information from loss, destruction and misuse.

For example, your personal information is only accessible by appropriately trained staff, volunteers and contractors, and stored on secure servers with features enacted to prevent unauthorised access, including encrypted storage.

## 12. How long we keep your personal information

In general, we will retain your information for as long as it is required in connection with the purposes for which it was collected and/ or used. However, if before that date (i) your personal information is no longer required in connection with such purpose(s), (ii) we are no longer lawfully entitled to process it or (iii) you validly exercise your right of deletion, we will remove it from our records at the relevant time.





That length of time may vary depending on the reasons for which we are processing the personal information and whether we have a legal (for example under financial regulations) or contractual obligation to keep it for a certain amount of time.

In some cases we will keep personal information at least as long as necessary to comply with relevant regulatory or statutory requirements. We will also retain information, when and as long as necessary, to resolve legal disputes.

### **13. Contact us (including complaints)**

Please let us know if you have any questions or concerns about this policy or the ways in which we use your personal information by contacting us:

By email at: [hr@londonsport.org](mailto:hr@londonsport.org).

By telephone on: 0203 848 4630.

By post to: London Sport, House of Sport, 190 Great Dover Street, SE1 4YB.

You are entitled to make a complaint at any time to the Information Commissioner's Office, the UK data privacy regulator (<https://ico.org.uk/global/contact-us/>). We always appreciate the opportunity to resolve your concerns before you feel it is necessary to approach the ICO.

