

GDPR Privacy Notice

Introduction: As part of any project, PUF collects and processes personal information, or personal data, relating to participants. This personal information may be held by PUF on paper or in electronic format.

PUF is committed to being transparent about how it handles your personal information, to protecting the privacy and security of your personal information and to meeting its data protection obligations under the **General Data Protection Regulation (GDPR)** and the **Data Protection Act 2018**. The purpose of this privacy notice is to make you aware of how and why PUF will collect and use your personal information. PUF are required under the GDPR to notify you of the information contained in this privacy notice. This privacy notice applies to all participants.

PUF has appointed a **Data Compliance Manager** to oversee compliance with this privacy notice. If you have any questions about this privacy notice or about how PUF handle your personal information, please contact them on the details at the end of this notice.

The Data Protection Principles: Under the GDPR, there are six data protection principles that PUF must comply with. **These provide that the personal information PUF hold about you must be:**

1. Processed lawfully, fairly and in a transparent manner.
2. Collected only for legitimate purposes that have been clearly explained to you and not further processed in a way that is incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary in relation to those purposes.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits your identification for no longer than is necessary for those purposes.
6. Processed in a way that ensures appropriate security of the data.

PUF is responsible for, and must be able to demonstrate compliance with, these data protection principles. This is called the Principle of Accountability.

What types of personal information do PUF collect about you? Personal information is any information about an individual from which that person can be directly or indirectly identified. It doesn't include anonymised data **i.e.** where all identifying particulars have been removed. There are also **special categories** of personal information, and personal information on criminal convictions and offences, which requires a higher level of protection because it is of a more sensitive nature. The special categories of personal information comprise information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and genetic and biometric data.

PUF collects, uses and processes a range of personal information about you. **This includes:**

- Your contact details, including your name, address, telephone number and personal e-mail address

PUF may also collect, use and process the following special categories of your personal information

- Whether or not you have a disability for which PUF needs to make reasonable adjustments during the recruitment process
- Information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation

How do PUF collect your personal information? PUF collects personal information about you directly from you.

Why and how do PUF use your personal information? PUF will only use your personal information when the law allows the organisation to. These are known as the **legal bases for processing**. PUF will use your personal information in one or more of the following circumstances:

- Where PUF need to comply with a legal or funders obligation (**e.g.** Safeguarding, injuries and illnesses to participants)
- Where it is necessary for PUF's legitimate interests (or those of a third party), and your interests or your fundamental rights and freedoms do not override PUF interests.

PUF need all the types of personal information listed under "**What types of personal information do PUF collect about you?**" primarily to enable the organisation to take steps at your request to provide a service to you or a dependent and to enable PUF to comply with its legal obligations. In some cases, PUF may also use your personal information where it is necessary to pursue PUF's legitimate interests (or those of a third party), provided that your interests or your fundamental rights and freedoms do not override PUF's interests. **PUF's legitimate interests include:**

- The safe participation of all participants
- Performing effective administration.

The purposes for which PUF are processing, or will process, your personal information are to:

- Comply with statutory and/or regulatory requirements and obligations
- Comply with the duty to make reasonable adjustments for disabled participants
- Monitor equal opportunities
- Enable PUF to establish, exercise or defend possible legal claims.
- Ensure effective communication
- Ensure the safe participation in our projects and a contact in the event of an emergency.

Please note that PUF may process your personal information without your consent, in compliance with these rules, where this is required or permitted by law.

Why and how do PUF use your sensitive personal information? PUF will only collect and use your sensitive personal information, which includes special categories of personal information and information about criminal convictions and offences, when the law allows PUF to.

Some special categories of personal information **i.e.** information about your health, is processed so that PUF can perform or exercise its obligations to participants.

Where PUF processes other special categories of personal information **i.e.** information about your racial or ethnic origin, religious or philosophical beliefs and sexual orientation, this is done only for the purpose of equal opportunities monitoring and evaluation of projects and in line with PUF's Data Protection Policy. Personal information that PUF uses for these purposes is either anonymised or is collected with your explicit written consent, which can be withdrawn at any time. It is entirely your choice whether to provide such personal information.

Change of purpose: PUF will only use your personal information for the purposes for which it was collected **i.e.** for the participation in the relevant project.

PUF may wish to keep your personal information on file for in case there are future suitable projects that may interest you. PUF will ask for your consent before your personal information is kept on file for this purpose. Your consent can be withdrawn at any time.

Who has access to your personal information? Your personal information may be shared internally within PUF for the purpose of notifying you of any upcoming projects; and - with your explicit consent - with Peterborough United Football Club Ltd (who's privacy notice can be found at www.theposh.com/website-privacy-policy/).

PUF may also need to share your personal information with a regulator or to otherwise comply with the law.

PUF may share your personal information with third parties where PUF need to comply with a legal obligation, or where it is necessary for PUF's legitimate interests (or those of a third party).

How does PUF protect your personal information? PUF has put in place measures to protect the security of your personal information. It has internal policies, procedures and controls in place to try and prevent your personal information from being accidentally lost or destroyed, altered, disclosed or used or accessed in an unauthorised way. In addition, PUF limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know in order to perform their job duties and responsibilities. You can obtain further information about these measures from PUF's **Data Compliance Manager**.

Where your personal information is shared with third parties, PUF require all third parties to take appropriate technical and organisational security measures to protect your personal information and to treat it subject to a duty of confidentiality and in accordance with data protection law. PUF only allow them to process your personal information for specified purposes and in accordance with PUF's written instructions and PUF do not allow them to use your personal information for their own purposes.

PUF also has in place procedures to deal with a suspected data security breach and PUF will notify the Information Commissioner's Office (or any other applicable supervisory authority or regulator) and you of a suspected breach where PUF are legally required to do so.

For how long does PUF keep your personal information? PUF will only retain your personal information for as long as is necessary to fulfil the purposes for which it was collected and processed.

Personal information which is no longer to be retained will be securely and effectively destroyed or permanently erased from PUF IT systems and PUF will also require third parties to destroy or erase such personal information where applicable.

In some circumstances PUF may anonymise your personal information so that it no longer permits your identification. In this case, PUF may retain such information for a longer period.

Your rights in connection with your personal information: As a data subject, you have a number of statutory rights. **Subject to certain conditions, and in certain circumstances, you have the right to:**

- **Request access to your personal information:** This is usually known as making a data subject access request and it enables you to receive a copy of the personal information PUF hold about you and to check that PUF are lawfully processing it
- **Request rectification of your personal information:** This enables you to have any inaccurate or incomplete personal information PUF hold about you corrected
- **Request the erasure of your personal information:** This enables you to ask PUF to delete or remove your personal information where there's no compelling reason for its continued processing **e.g.** it's no longer necessary in relation to the purpose for which it was originally collected
- **Restrict the processing of your personal information:** This enables you to ask PUF to suspend the processing of your personal information **e.g.** if you contest its accuracy and so want PUF to verify its accuracy
- **Object to the processing of your personal information:** This enables you to ask PUF to stop processing your personal information where PUF are relying on the legitimate interests of the business as the legal basis for processing and there is something relating to your particular situation which makes you decide to object to processing on this ground
- **Data portability:** This gives you the right to request the transfer of your personal information to another party so that you can reuse it across different services for your own purposes.

If you wish to exercise any of these rights, please contact PUF's **Data Compliance Manager**.

PUF may need to request specific information from you in order to verify your identity and check your right to access the personal information, or to exercise any of your other rights. This is a security measure to ensure that your personal information is not disclosed to any person who has no right to receive it.

In the limited circumstances where you have provided your consent to the processing of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. This will not, however, affect the lawfulness of processing based on your consent before its withdrawal. If you wish to withdraw your consent, please contact PUF's **Data Compliance Manager**. Once PUF have received notification that you have withdrawn your consent, PUF will no longer process your personal information for the purpose you originally agreed to, unless PUF have another legal basis for processing.

If you believe that PUF has not complied with your data protection rights, you have the right to make a complaint to the Information Commissioner's Office (ICO) at any time. The ICO is the UK supervisory authority for data protection issues.

Transferring personal information outside the European Economic Area: PUF will not transfer your personal information to countries outside the European Economic Area.

Changes to this privacy notice: PUF reserves the right to update or amend this privacy notice at any time. PUF will issue you with a new privacy notice when PUF make significant updates or amendments. PUF may also notify you about the processing of your personal information in other ways.

Contact: If you have any questions about this privacy notice or how PUF handle your personal information, please contact PUF's **Data Compliance Manager** on the details provided below:

Data Compliance Manager	
Name	Nick Sheppard
Job Title	Community Manager
Telephone Contact	01733 563947
Email	nick.sheppard@theposh.com
Postal Address	ABAX Stadium, London Road, Peterborough. PE2 8AL