



POLICY TITLE: CENTRAL PRIVACY POLICY

Data Compliance Manager	Paul Newman
Effective date	[25/102024]
Review date	[24/10/2025]
Review Committee	Finance and Governance

DERBY COUNTY COMMUNITY TRUST

CENTRAL PRIVACY POLICY

1. INTRODUCTION

- 1.1 Welcome to Derby County Community Trust's ("**DCCT**") Central Privacy Policy.
- 1.2 We respect your privacy and are committed to protecting your personal data. This Central Privacy Policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) or engage with us for services, and tell you about your privacy rights and how the law protects you.

2. PURPOSE OF THIS PRIVACY POLICY

- 2.1 This Central Privacy Policy aims to give you information on how DCCT collects and processes your personal data, including any data you may provide through our website when you register your interest in a programme that we manage or are involved in.
- 2.2 This Central Privacy Policy is to be read in conjunction with any programme specific privacy policy which applies to your engagement with us and which can be requested by emailing data@dcct.co.uk. It is important that you read this Central Privacy Policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Central Privacy Policy supplements the other notices and is not intended to override them.

3. CONTACT DETAILS

Our full details are: Derby County Community Trust registered in England and Wales under number 06498920 and our registered office is at 14 Pride Point Drive, Pride Park, Derby, DE24 8BX

Full name of legal entity: Derby County Community Trust.

Email address: data@dcct.co.uk

Postal address: 14 Pride Point Drive, Pride Park, Derby, Derbyshire, England, DE24 8BX.

Telephone number: 01332 416140

4. CONTROLLER

4.1 DCCT is the controller and responsible for your personal data (collectively referred to as, **we**, **us** or **our** in this Central Privacy Policy).

4.2 We have appointed a Data Compliance Manager ("**DCM**") who is responsible for overseeing questions in relation to this Central Privacy Policy. If you have any questions about this Central Privacy Policy, including any requests to exercise your legal rights please contact the data privacy manager using the details set out below.

5. RIGHT TO COMPLAIN

5.1 You have the right to make a complaint at any time to the Information Commissioner's Office ("**ICO**"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

5.2 Data protection law requires DCCT, as controller for your data:

5.2.1 to process your data in a lawful, fair and transparent way;

5.2.2 to only collect your data for explicit and legitimate purposes;

5.2.3 to only collect data that is relevant, and limited to the purpose(s) we have told you about;

5.2.4 to ensure that your data is accurate and up to date;

5.2.5 to ensure that your data is only kept as long as necessary for the purpose(s) we have

told you about;

5.2.6 to ensure that appropriate security measures are used to protect your data.

6. BOARD REVIEW

6.1 This policy will be reviewed in line with the dates set out on the cover page. DCCT will ensure that its policies relating to GDPR remain updated and compliant with current legislation. When reviewing the policy Board will consider:

6.1.1 changes in the CCO's services or activities;

6.1.2 any changes in the legislative framework; and

6.1.3 any new guidance published by the ICO which is applicable to the CCO.

7. CHANGES TO THE PRIVACY POLICY AND YOUR DUTY TO INFORM US OF CHANGES

7.1 Historic versions of this policy can be obtained by contacting us via email data@dcct.co.uk.

7.2 It is important that the personal data we hold about you is accurate and current. We may ask you to confirm updates to your personal data from time to time but please keep us informed if your personal data changes during your relationship with us in the meantime. Please inform the DCM of any changes in your data at the following email address: data@dcct.co.uk.

8. THIRD-PARTY LINKS

8.1 We work with various third party organisations for the delivery of our services and programmes. Our website may also include links to third-party websites, plug-ins and applications relating to organisations we work with or others. Clicking on those links or enabling those connections may allow third parties to collect or share data about you.

8.2 We and organisations that we work with or which are connected with us (including but not limited to The Premier League, The English Football League Trust, The NCS Trust and Derby County Football Club) have a social media presence for the purpose of engaging with you.

8.3 If you enable such connections or choose to communicate your personal data to us via third-party websites or social media, please remember that we do not control these third-party websites and are not responsible for their privacy statements. When you leave our website or interact with us on social media, we encourage you to read the privacy policy of every website or forum that you visit or use.

9. THE DATA WE COLLECT ABOUT YOU

- 9.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 9.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
- 9.2.1 **Identity Data** – includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender and photographs.
 - 9.2.2 **Contact Data** – includes billing address, delivery address, email address and telephone numbers.
 - 9.2.3 **Welfare Data** – includes mental and physical health and medical information relevant to the programme you are participating in or services which we are delivering to you.
 - 9.2.4 **Safeguarding Data** – includes information ascertaining to accidents and incidents.
 - 9.2.5 **Financial Data** – includes bank account and payment card details.
 - 9.2.6 **Transaction Data** – includes details about payments to and from you and other details of products and services you have purchased from us.
 - 9.2.7 **Technical Data** – includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
 - 9.2.8 **Profile Data** – includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
 - 9.2.9 **Usage Data** – includes information about how you use our website, products and services.
 - 9.2.10 **Marketing and Communications Data** – includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 9.3 We refer to the above categories of data in the processing table below.
- 9.4 We may also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of individuals accessing a specific programme or service. However, if we combine or connect Aggregated Data with your

personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Central Privacy Policy.

- 9.5 Where we collect Special Categories of Personal Data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) much of this information is provided by way of Welfare Data and identified as such in our information tables. We may also collect information about criminal convictions and offences for certain programmes and services. Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. All such information is collected in accordance with this and any programme specific privacy policy. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

10. IF YOU FAIL TO PROVIDE PERSONAL DATA

- 10.1 Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel the service you request from us but we will notify you if this is the case at the time.

11. HOW IS YOUR PERSONAL DATA COLLECTED?

- 11.1 We use different methods to collect data from and about you including through:

11.1.1 **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- (a) apply for our programmes or services;
- (b) create an account on our website;
- (c) subscribe to our services, programmes or publications;
- (d) request marketing to be sent to you;
- (e) enter a competition, promotion or survey;
- (f) apply for employment with DCCT; or
- (g) give us some feedback.

11.1.2 **Automated technologies or interactions.** As you interact with our website, we may

automatically collect **Technical Data** about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please contact us for further details.

11.1.3 **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below.

11.1.4 **Technical Data** from analytics providers such as Google Analytics and Cloudflare based outside the EU;

11.1.5 **Contact, Financial and Transaction Data** from providers of technical, payment and delivery services.

11.1.6 **Identity and Contact Data** from publicly available sources such as Companies House and the Electoral Register based inside the EU.

11.1.7 **Identity, Contact and Welfare Data** from third party organisations who we work with to deliver services and programmes such as Schools, the FA and Derby County Football Club.

12. HOW WE USE YOUR PERSONAL DATA

12.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

12.1.1 Where we need to perform the contract we are about to enter into or have entered into with you.

12.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

12.1.3 Where we need to comply with a legal or regulatory obligation.

12.1.4 We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

12.2 Please see below to find out more about the types of lawful basis that we will rely on to process your personal data.

12.3 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message or where the personal data involved is a special category of personal data. You have the right to withdraw consent to marketing at any time by contacting us.

13. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

- 13.1 We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 13.2 Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

14. STAFF TRAINING

- 14.1 DCCT GDPR policies and procedures are included in all staff inductions when commencing employment with the Trust. Staff are expected to familiarise themselves with all Trust policies during the induction process but specific emphasis is placed on all policies relating to the collection, storage and sharing of data.
- 14.2 Staff will be expected to take refresher GDPR training every two (2) years or where there is a significant change in policy, processes and or legislation.
- 14.3 Training will be recorded using the Staffology HR system and Line Managers will be responsible for ensuring all of their staff have undertaken the required training elements.
- 14.4 As with all policies and procedures, where legislation changes we will ensure that DCCT responds accordingly in relation to the upskilling of its staff.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To respond to your enquiry	(a) Identity (b) Contact (c) Welfare (if provided in your enquiry)	Performance of a contract with you
To register you as a participant	(a) Identity (b) Contact	Performance of a contract with you

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
	(c) Welfare	
<p>To deliver the Programme to you and enable your Participation which may include:</p> <p>(a) Managing payments, fees and charges</p> <p>(b) Collecting and recovering money owed to us</p> <p>(c) Updating you as to programme events and changes</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Welfare</p> <p>(d) Financial</p> <p>(e) Transaction</p> <p>(f) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (to recover debts due to us)</p>
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Asking you to leave a review or take a survey</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and to study how participants use our programmes/services)</p>
To enable you to	(a) Identity	(a) Performance of a contract

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
partake in a prize draw, competition or complete a survey	(b) Contact (c) Profile (d) Usage (e) Marketing and Communications	with you (b) Necessary for our legitimate interests (to study how participants use our services, to develop them and grow our organisation)
To administer and protect our organisation	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our organisation, provision of administration and IT services, network security, to prevent fraud and in the context of a reorganisation or restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how participants use our programmes/services, to develop them, to grow our organisation and to inform our marketing strategy)
To use data analytics to improve our website,	(a) Technical	Necessary for our legitimate interests (to define types of

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
programmes/services, marketing, participant relationships and experiences	(b) Usage	participants for our programmes and services, to keep our website updated and relevant, to develop our organisation and to inform our marketing strategy)
To make suggestions and recommendations to you about programmes, activities or events that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our organisation)

15. MARKETING

- 15.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. You can manage your marketing preferences or opt out of marketing at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

16. PROMOTIONAL OFFERS FROM US

- 16.1 We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which programmes, services and offers may be relevant for you (we call this marketing).
- 16.2 You will receive marketing communications from us if you have requested information from us or registered for a Programme with us or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

17. THIRD-PARTY MARKETING

- 17.1 We will get your express opt-in consent before we share your personal data with any company

outside of DCCT for marketing purposes. Please note that where you register for a programme delivered by us together with a third party, you must contact the third party programme partner in relation to your marketing preferences for that third party.

18. OPTING OUT

- 18.1 You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.
- 18.2 Where you opt out of receiving marketing messages, this will not apply to personal data provided to us as a result of registering for a programme or service from us or other transactions.

19. COOKIES

- 19.1 You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please contact us.

20. CHANGE OF PURPOSE

- 20.1 We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.
- 20.2 If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.
- 20.3 Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

21. DISCLOSURES OF YOUR PERSONAL DATA

- 21.1 We may have to share your personal data with the parties set out below for the purposes set out in the table above.
 - 21.1.1 Other DCCT departments and programme coordinators;
 - 21.1.2 External third parties such as Schools, the FA, Derby County Football Club, IT service providers, other service providers, HM Revenue and Customs, our professional and legal advisers;

- 21.1.3 Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Central Privacy Policy.
- 21.2 We require all third parties with which we work to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

22. INTERNATIONAL TRANSFERS

- 22.1 We do not transfer your personal data outside the European Economic Area ("**EEA**").
- 22.2 In the event that we do require to transfer your personal data out of the EEA, we will notify you by way of update to this Central Privacy Policy and ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
 - 22.2.1 We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
 - 22.2.2 Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
 - 22.2.3 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- 22.3 In the event of such an update, please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

23. DATA SECURITY

- 23.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.
- 23.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

24. DATA RETENTION

24.1 How long will you use my personal data for?

- 24.1.1 We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 24.1.2 To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 24.1.3 Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.
- 24.1.4 In some circumstances you can ask us to delete your data and if you require this, please contact us for further information.
- 24.1.5 In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

24.2 No fee usually required

- 24.2.1 You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

24.3 What we may need from you

- 24.3.1 We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

24.4 Time limit to respond

- 24.4.1 We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

25. YOUR LEGAL RIGHTS

25.1 You have the right to:

- 25.1.1 **Request access** to your personal data (commonly known as a "**data subject access request**"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 25.1.2 **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 25.1.3 **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 25.1.4 **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 25.1.5 **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - (a) if you want us to establish the data's accuracy;
 - (b) where our use of the data is unlawful but you do not want us to erase it;
 - (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 25.1.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly

used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

25.1.7 **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

25.2 If you wish to exercise any of the rights set out above, please contact us.

26. **LAWFUL BASIS**

26.1 A lawful basis is:

26.1.1 **Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

26.1.2 **Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

26.1.3 **Comply with a legal or regulatory obligation** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.