

General Data Protection Regulation

Privacy Notice

BACKGROUND

Drop & Dash is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your working relationship with us, in accordance with the General Data Protection Regulation (GDPR)

It is important that you read this notice when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

DATA CONTROLLER

Drop & Dash is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

DATA PROTECTION PRINCIPLES

We comply with data protection law. This says that personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

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). There are also "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store and use the following categories of personal information about you:

Parent/Guardian Information

Personal contact details such as name, telephone number, email address and school that your child attends.

Child Information

Personal information such as name, gender, date of birth, medical conditions (relevant to the club they are booked on to), emergency contact details (name and contact number), special needs, allergies, epipen status, parent details.

Staff data – our employees

Personal information such as

- Name, title, address, telephone numbers and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Start date
- Location of employment or workplace
- Copy of driving license/ID
- Copy of car insurance policy
- Recruitment information (including copies of right to work documentation, reference and other information included in a CV or cover letter or as part of the application process
- Interview notes
- Employment records
- Performance information
- Disciplinary and grievance information
- Photographs & videos

We may also collect, store and use the following "special categories" of more sensitive personal information

- Information about your health, including any medical conditions, health and sickness records
- Information about criminal convictions and offences

Coach data - contractors

Personal information such as:

- Name, address, telephone number, email address
- Date of birth
- Gender
- VAT registration status
- Proof of insurance
- Photo ID
- Proof of address
- Qualification
- "England and Wales DBS Certificate, / Scottish PVG Certificate or Access NI Certificate
- Reference details (full name, phone number, email address, date known applicant since)
- Reference ratings and suitability response
- Bank account details
- Pay details
- Performance information
- Location of workplace

We may also collect, store and use the following "special categories" of more sensitive personal information

- Information about your health, including any medical conditions, health and sickness records
- Information about criminal convictions and offences

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

2. Parent/Guardian Information

We collect personal information about parents/guardians through the Drop & Dash registration platform or on the phone which parents/guardians provide us.

Child Information

We collect personal information which parents/guardians provide us about children through the Kids' Club platform.

4. Staff data – our employees

We collect personal information about our employees through the application & registration process, either directly from candidates or sometimes from an employment agency. We may sometimes collect additional information from third parties including former employees or references.

Coach data – contractors

We collect personal information about coaches and/or contractors through the application process, either directly through the coaches or from a coaching organisation. We may also collect additional information from third parties including former employers or when taking references.

HOW WILL WE USE INFORMATION ABOUT YOU?

We will only use your personal information when the law allows us to do so and will only use it for the purposes for which we collected it. If we need to use your personal information for an unrelated purpose, we will notify you and will explain the legal basis which allows us to do so.

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

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use personal information relating to criminal convictions, cautions or other court actions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations with respect to our child protection and safeguarding.

We will only collect such information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

AUTOMATED DECISIONS

We do not envisage that any decision will be taken about you using automated means, however we will notify you in writing if this situation changes.

DATA RETENTION

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, audit trail or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount of time, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use and the applicable legal requirements.

In some circumstances we may anonymise your personal information so it can no longer be associated with you, in which case we may use such information without further notice to you.

RIGHT OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

It is important that the personal information we hold about you is accurate and correct. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances you have the right to:

• Request Access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you.

Information about children may be released to a person with parental responsibility. However, the best interests of the child will always be considered.

• **Request Correction** of the personal information we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

We will try to ensure the data collected is accurate and if we identify any data accuracy issues, we will communicate lessons learned to staff through internal staff training.

- **Request Erasure** of your personal information. This enables you to ask us to delete or remove personal information when:
- It is no longer necessary for us to hold it
- You withdraw your consent for us to keep it
- It was unlawfully processed (ie. in breach of the GDPR)
- It has to be erased in order to comply with a legal obligation
- We may refuse to comply with a request for erasure for the following reasons:
- To exercise the right of freedom of expression and information
- To comply with a legal obligation
- The defense of legal claims
- **Object to processing** of your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enable you
 to ask us to suspend the processing of personal information about you, for example
 if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing and they will respond within 28 days.

You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure you have the right to access the information. This is an appropriate security measure to ensure that personal information is not disclosed to any personal who has no right to receive it.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time and without notice.