

# Active Together Privacy Policy



(Formerly Leicester-Shire & Rutland Sport/LRS)

(Last Reviewed & Updated: May 2023)

This privacy policy sets out how Active Together uses and protects any information that you give us. Active Together is hosted by Leicester-Shire County Council (LCC) and this policy complies with LCCs data protection and privacy policy guidance; which can found [here](#). Active Together is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy policy.

This policy applies to you if you are either:

1. An individual who has contacted us to receive updates about funding, upcoming event information and other ways to get involved further with sport, physical activity and health in your region;
2. A participant at one of our partner led developments, events, programmes or workshops or;
3. An individual or an employee of an organisation who (i) has contacted us; or (ii) we have contacted or highlighted as an organisation who may be interested in our work.

Active Together may change this policy from time to time by updating this page. You should check from time to time to ensure that you are happy with any changes.

For the purpose of the Data Protection Act 1998, the data controller is Active Together, SportPark, 3 Oakwood Drive, Loughborough, Leicestershire, LE11 3QF. The information you provide will be held in accordance with the Data Protection Act and may be used by LRS to supply the services which you have requested.

## Why are we allowed to process your information?

For personal data subject to the General Data Protection Regulation, we rely on several legal bases to process your data. These include:

- Your consent as the lawful condition.
- When you have given your consent, which you may withdraw at any time using your account setting (my dashboard > account > email & sharing), or at the bottom of any marketing newsletter you receive. Please note this will not apply to booking confirmation emails or other notification emails that are required for us to perform a contract with you.
- When the processing is necessary to perform a contract with you, like the Terms and Conditions.
- Using our legitimate business interests such as improving, personalising, and developing a sport and physical activity service and promoting the safety and security as described below.

## What information we collect

You may provide us with or we may obtain **personal information** about you, such as information regarding your:

- Personal contact details that allows us to contact you directly such as name, title, email addresses, postcode and telephone numbers;
- Date of birth;

- Gender;
- School name, pupil name, gender, UPN, SEN status and year group, access to free school meals and attendance on the Active Together Team Leicestershire and Daily Boost websites and/or Virtual Together app (hosted by Playwaze). A Fair Processing Notice applies to this data.
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Details you provide about your physical activity and sporting experiences regarding the programmes you attend. Any information you give us about your interests and getting further involved in physical activity and sport;
- Any feedback you provide in a written or verbal format, for example, surveys and interviews;
- Records of your attendance at any events, competitions or workshops delivered by us or our sports partners;
- Images in video and/or photographic form and voice recordings;
- Any payment or bank details you provide so that we can receive payments from you or you can receive funding from us and details of the financial transactions with you;
- Use of, and interactions with our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- Any funding application details; and
- Your marketing preferences so that we know whether and how we should contact you.

## Special Categories of Personal Information

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

- Information about your race or ethnicity, religious beliefs, sexual orientation;
- Information about your health, including any medical condition, health and sickness records, medical records and health professional information.

We may not collect all of the above types of special category personal information about you. In relation to special category personal data that we do process we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis;
- It is necessary for the establishment, exercise or defence of legal claims;
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- It is necessary for your participation in our Exercise Referral Schemes requiring ParQ's.
- Based on your explicit consent.

## Where we collect our information

We typically collect personal information when you create an account on our website, [www.active-together.org](http://www.active-together.org) or on our affiliate websites, on our Virtual Together app (hosted by Playwaze), sign up for our newsletter, download content off our website, contact us about funding, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you when you attend one of the events, programmes or workshops hosted by us or one of our delivery partners or activity providers.

## How we use your information

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<p><b>To administer any account(s) you have with us and managing our relationship with you, including dealing with enquiries made by you</b></p>	<p>All contact details, records of your interactions with us, and marketing preferences.</p> <p>Use of and interactions through our online portal.</p>	<p>This is necessary to enable us to properly manage and administer your account with us.</p>
<p><b>To send you marketing information, that is tailored to your personal interests and website profile that we think you might find useful or which you have requested from us. This might include our newsletter and information about our events and any activities from or about our partners and activity providers to further progress your interest in sport and physical activity</b></p>	<p>Contact details and marketing preferences.</p> <p>Details you provide about your experience in physical activity and, your interests in getting further involved in physical activity.</p>	<p>Where you have given us your explicit consent to do so.</p> <p>You can unsubscribe from our Newsletters at any point, by using the link found at the bottom of the Newsletter.</p>
<p><b>To deal with your queries or complaints</b></p>	<p>Contact details and records of your interactions with us.</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with the service we provide.</p>
<p><b>Retention of records</b></p>	<p>All the personal information we collect.</p>	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage any account you have with us and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<p><b>To conduct monitoring and evaluation studies for the purpose of demonstrating impact and improving services</b></p>	<p>Records of your attendance and anonymised demographic and evaluation data from any of our programmes, events and competitions.</p> <p>Contact details and records of your interactions with us from downloading content off our website.</p>	<p>We have a legitimate interest in doing so to ensure that our work continues to improve and is targeted and relevant.</p>
<p><b>For the purposes of promoting physical activity and sport in the region, our campaigns and events and the work we do as an Active Partnership</b></p>	<p>Images in video and/or photographic form.</p>	<p>Where you have given us your explicit consent to do so through our photo/video consent forms, when appropriate.</p>
<p><b>To comply with health and safety requirements</b></p>	<p>Records of attendance and health and medical information.</p>	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in physical activity and sport.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above.</p>
<p><b>To use information about your physical or mental health (including any injuries) or disability status to ensure your health and safety and to assess your fitness to participate in any of the activities or events we host</b></p>	<p>Health information.</p>	<p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above.</p>
<p><b>For the purposes of equal opportunities monitoring</b></p>	<p>Name, title, date of birth, gender, information about your race or ethnicity, and health information.</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the "special category</p>

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
		reasons for processing of your personal data" referred to above.
<b>To administer your attendance at any courses, events or programmes you sign up to</b>	All contact details, date of birth, gender, health, medical information, race or ethnicity.	This is necessary to enable us to register you on to and arrange for the effective delivery of our development programmes and events.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to above.
<b>To manage the process of applying to us for funding</b>	All details provided in your funding application.	This is necessary to enable us to properly manage and assess your application.
<b>To make payments to you where we have agreed to fund a project</b>	Transaction and payment data.	This is necessary to make payments to you.
<b>To arrange and manage contracts for the provision of services/products</b>	Transaction and payment data, contact details.	This is necessary to enable us to properly manage and perform any contract for services and products.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults</b>	Information about your criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To manage the process of entry or nomination into any of the Sports / Community Awards</b>	All details provided in your awards application.	This is necessary to enable us to properly manage and assess your application.

## Who will we share this with?

As the Data Controller, Active Together do not share your personal information except in the limited circumstances described below:

### 1. When you agree or direct us to share

You may direct us to disclose your information to others, for example other SportSuite clients. For certain information, we provide you with privacy preferences ([link](#)).

## **2. For legal reasons or to prevent harm**

We may preserve or disclose information about you to comply with law, regulation, legal process, or governmental request; to assert legal rights or defend against legal claims; or to prevent, detect, or investigate illegal activity, violations of our terms, or threats to the security of Active Together services or the physical safety of any person.

## **3. Non-personal information**

We may share non-personal information that is aggregated so that it cannot reasonably be used to identify an individual. We may disclose such information publicly and to third parties, for example, in public reports about exercise and activity, or to funding partners under agreement with us, for example, Sport England and the local authorities of Leicestershire, Leicester and Rutland.

# **Where we store your personal data**

All information you provide to us is stored on secure servers. This includes as an account on our website User Management System/CRM System, to enable us to administer communications with you, and marketing information where explicit consent has been given. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

# **Your rights**

If you reside in the European Economic Area, you have certain rights to the Personal Data that we have collected about you. You may request to see a copy of the personal information we hold about you. The law also provides you with other rights regarding your information including some around; correction of inaccurate data, objection to processing, moving your information to somewhere else, and in some cases, getting your information deleted. To exercise your rights to your Personal Data, please contact us at [www.active-together.org/contact](http://www.active-together.org/contact) or using the postal address, Active Together, SportPark, 3 Oakwood Drive, Loughborough, Leicestershire, LE11 3QF. We will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

Information security incidents will be investigated by LCCs Information and Security Team. Under GDPR/DPA 2018 we have to report most incidents to the Information Commissioners Office (ICO) within 72 hours of becoming aware of them.

If you are not satisfied with any response you may receive from us based on a complaint or concern about your personal information, you then have the option of contacting the Information Commissioners Office to take that complaint further. The Information Commissioners Office does like to see that you have raised a complaint with agent first and received a response before contacting them. If you do wish to contact them, the address details can be found below:

The Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF. Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate). Website: [www.ico.org.uk](http://www.ico.org.uk); Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

## **How long will we keep it for?**

We will only keep this information for as long as necessary or as the law requires.

## **What if something changes?**

If the information you provided changes or your circumstances change please update your personal profile and settings; (my dashboard > account > email & sharing). If we need to change something like who we want to share this information with, we will contact you to let you know.

## **Links to other websites**

Our website may contain links to other websites of interest. However, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

## **Controlling your personal information**

We will never sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. Our agents may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen.