



PRIVACY STATEMENT

1 INTRODUCTION

EFL Trust committed to protecting and respecting the personal data that we hold on our service users, affiliated organisations, sport clubs, suppliers and other business partners. This privacy statement describes why and how we collect and use personal data and provides information about data subjects' rights. It applies to personal data provided to us, both by individuals themselves or by others. We may use personal data provided to us for the purposes described in this privacy statement or as made clear before collecting personal data.

Personal data is any information relating to an identified or identifiable living person. When collecting and using personal data, our policy is to be transparent about why and how we process personal data.

We process personal data for numerous purposes, and the means of collection, lawful basis of processing, use, disclosure, and retention periods for each purpose are set out in the relevant sections below. We do not engage in any form of profiling and we obtain consent for all marketing activities.

The personal data that is provided to us is provided either directly from the individual concerned, from a third party acting on behalf of an individual (parents on behalf of their children, affiliated sports club/schools/community organisations on behalf of young service users etc.), or from publicly available sources (such as internet searches, Companies House). Most of the time, EFL Trust obtains personal data through the contracts it signs with community organisations and other business partners, as well as with young service users and suppliers or contractors. The legal basis for processing is required for contract and in some limited instances we will process personal data under legitimate business interest (such as business development).

Where EFL Trust receive personal data that relates to an individual from a third party, we request that this third party inform the individual of the necessary information regarding the use of their data. Where necessary, reference may be made to this privacy statement.

2 SECURITY

EFL Trust take the security of all the data we hold seriously. Relevant employees are trained on data protection, confidentiality and security.

We have a framework of policies and procedures which ensure we regularly review the appropriateness of the measures we have in place to keep the data we hold secure.

All information you provide to us is stored on our secure servers.

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.

3 DATA THAT WE HOLD

3.1 SERVICE USERS, COMMUNITY ORGANISATIONS AND SCHOOLS

Please see our separate privacy notice specific to the project you are involved with.

3.2 OUR PEOPLE

Please see our separate staff privacy notice.

3.2.1 Applicants

Where an individual is applying to work for EFL Trust, personal data is collected through the application process.

There are a number of purposes that personal data for applicants are collected.

- Employment. We process an applicant's personal data in order to assess their potential employment at EFL Trust.
- Administration and management. We may also use this personal data in order to make informed management decisions and for administration purposes.

Personal data collected for applicants is held for as long as necessary in order to fulfil the purpose for which it was collected, or for a maximum of 10 years where those purposes no longer become necessary.

3.3 SUPPLIERS CONTRACTORS AND OTHER BUSINESS PARTNERS

We collect and process personal data about our suppliers, contractors, subcontractors, sponsors, events partners and other business partners (as well as any individuals associated with them). The data is held to manage our relationship, to contract and receive services from them, and in some cases to provide services to service users, including holding sport events, and providing membership-related benefits. We will always have processing agreements in place with our processors and sharing agreements with our third party partners.

3.3.1 Why do we process data?

- Receiving goods and services. We process personal data in relation to our suppliers and their staff as necessary to receive the services and deliver the goods and services.
- Providing services to service users. Where a supplier is helping us to deliver professional services or products to our service users, we process personal data about the individuals involved in providing the services or products in order to administer and manage



our relationship with the supplier and the relevant individuals and to provide such services to our service users.

- Administering, managing and developing our businesses and services. We process personal data in order to run our business, including:
 - managing our relationship with sponsors, suppliers, vendors or other business partners;
 - developing our businesses and services;
 - maintaining and using IT systems; and
 - administering and managing our websites, databases, CRMs and other systems.
- Security, quality and risk management activities. We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.
- Complying with any requirement of law, regulation or a professional body of which we are a member. We are subject to legal, regulatory and professional obligations. We need to keep certain records to show we comply with those obligations and those records may contain personal data.

3.3.2 What data do we hold?

We will hold supplier's names, contacts names, and contact details of suppliers, sponsors, affiliated organisations, vendors or business partners as well as banking and other financial information. We also keep invoices, financial information and contracts, and quality assurance activity.

We will only process personal information when the law allows us to. Depending on the processing activity, we rely on the following lawful bases:

1. Article 6(1)(b), Where we need to perform the contract we have entered into with you
2. Article 6(1)(c), Where we need to comply with a legal obligation
3. Article 6(1)(d), Where we need to protect your vital interests, or those of somebody else, and you are incapable of providing consent.
4. Article 6(1)(f) Where it is necessary for our legitimate interests, your legitimate interests, or those of a third party, and your interests and fundamental rights do not override those interests



3.3.3 How long do we hold data for?

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected (including as required by applicable law or regulation). Data may be held for longer periods where required by law or regulation and in order to establish, exercise or defend our legal rights. In general we hold this information for a maximum of 10 years.

4 SHARING PERSONAL DATA

We will only share personal data with others when we are legally permitted to do so. When we share data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security standards. When sharing data we will always put in place a sharing agreement and ensure data adequacy.

Personal data held by us may be transferred to:

Third party organisations that provide applications/functionality, data processing or IT services to us

We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems and other systems and applications.

Third party organisations that otherwise assist us in providing services or information, such as our network of Community Club Organisations.

Law enforcement or regulatory agencies or those required by law or regulations

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

5 LOCATIONS OF PROCESSING

Where possible, personal data resides within the EU but may be transferred to, and stored at, a destination outside the European Economic Area (EEA). Information will only be transferred outside of the EEA where the transfer meets the adequacy requirements of the GDPR.

6 INDIVIDUAL'S RIGHTS

Individuals have certain rights over their personal data and data controllers are responsible for fulfilling these rights as follows:

- Individuals may request access to their personal data held by us as a data controller.



- Individuals may request us to rectify personal data submitted to us or, where appropriate, contact us via the relevant website registration page or by amending the personal details held on relevant applications with which they registered.
- Individuals may request that we erase their personal data
- Where we process personal data based on consent, individuals may withdraw their consent at any time by contacting us or clicking on the unsubscribe link in an email received from us.
- Individuals may have other rights to restrict or object to our processing of personal data and the right to data portability.
- Individuals may request information about, or human intervention into, any automated data processing that we may undertake.

If you wish to exercise any of these rights, please send an email info@efltrust.com

7 COMPLAINTS

We hope that you won't ever need to, but if you do want to complain about our use of personal data, please send an email with the details of your complaint to info@efltrust.com for the attention of **the Data Protection Officer**. We will look into and respond to any complaints we receive.

You also have the right to lodge a complaint with the UK data protection regulator, the Information Commissioner's Office ("ICO"). For further information on your rights and how to complain to the ICO, please refer to the ICO website <https://ico.org.uk/concerns>

8 CHANGES TO OUR PRIVACY STATEMENT

Our up to date privacy policy is available on our website.

Version: December 2019