

GoSport Activity Centre GDPR Policy

Definitions

GDPR	General Data Protection Regulation
Responsible Person	Nathan Cole
Register of Systems	Means a register of all systems or context in which personal data is processed by GoSport Activity Centre

1. Data protection principles

GoSport Activity Centre is committed to processing data in accordance with its responsibilities under GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- a. This policy applies to all personal data processed by GoSport Activity Centre.
- b. The Responsible Person shall take responsibility for GoSport Activity Centre's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. GoSport Activity Centre shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, GoSport Activity Centre shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the GoSport Activity Centre shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by GoSport Activity Centre must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate.
- b. GoSport Activity Centre shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the GoSport Activity Centre's systems.
- e. For courses sponsored by the Royal Navy, the information you provide is shared with the RN for their grant tracking purposes. Details on this can be found in the Register of Systems.

5. Data minimisation

- a. GoSport Activity Centre shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. GoSport Activity Centre shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, GoSport Activity Centre shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

- a. GoSport Activity Centre shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, GoSport Activity Centre shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

10. IT Acceptable Use

10.1 Misuse of IT and communications systems can damage the business and our reputation. Breach of this policy may be dealt with under our Disciplinary Policy and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

10.2 Should you require written copies of Company passwords, these should be kept in an unmarked envelope in a locked cabinet, passwords should have no indication of associated accounts or websites.

10.3 You are responsible for the security of the equipment allocated to or used by you and you must not allow it to be used by anyone other than in accordance with this policy. Anyone who is not authorised to access our equipment should only be allowed to use equipment under supervision of competent GoSport Staff.

10.4 No young people attending activities should be given access to or be shown any sensitive information of other clients or be allowed to use any GoSport Activity Centre IT equipment. This includes the use of walkie talkies, personal mobiles and company laptops.

10.5 You should not delete, destroy or modify existing systems, programs, information or data (except as authorised in the proper performance of your duties).

10.6 Internet access is provided for business purposes. Occasional personal use may be permitted at the Directors' discretion.

10.7 You should not under any circumstances use our systems to participate in any internet chat room, post messages on any internet message board or set up or log text or information on a blog or wiki, even in your own time.

Under the General Data Protection Regulation, you retain the following rights;

- The right to be informed of the use of your data
- The right of access
- The right to rectify any changes
- The right to erasure
- The right to restrict the use of your data

Should you wish to act upon any of the above rights please email info@gosportactivitycentre.co.uk.
We will act upon requests within a month of the request date.

Revision	Date of Review	Review Carried out By	Comments
A	01/07/2019	Nathan Cole	• Draft
B	10/07/2019	Nathan Cole	• Publication
C	05/04/2020	Nathan Cole	• Additional RN Requirements
D	22/04/2020	Alex Merrifield	• Brand Changes
E	08/01/2022	Nathan Cole	• 2022 Review
F	02/10/2022	Nathan Cole	• 2022 End of Season Review
G	04/11/2023	Nathan Cole	• 2023 review and addition of revision table
H	14/07/2024	Isaac Wahltuch	• Addition of IT Acceptable Use policy.