

**Policy Ref:**  
**# GOV17**



# Privacy Policy

## Clients / Partners

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Approved By	SMT
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### Policy Update Record (Version Control)

Date	Author	Change(s)
29/06/2024	Rachel Martin	Policy re-formatted and updated.

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## Introduction

The purpose of this privacy notice is to inform you what to expect us to do with your personal information when you contact us, use one of our services, or assist/advise in any capacity with our organisational delivery.

Please refer to each of our programme's privacy notices for specific information about how the activities you are involved with collect, use, and hold your data.

Our contact details Address: SASP, Chelston Business Park, Wellington, Somerset, TA21 9JQ  
Phone Number: 01823 653990  
E-mail: [enquiries@sasp.co.uk](mailto:enquiries@sasp.co.uk)  
Website: <https://www.sasp.co.uk>

## Who sees your personal information?

The personal information we collect about you will be used by our staff and volunteers at SASP so that they can support you, and possibly:

- by a few selected organisations that work with us or on our behalf to deliver our services.
- when required to legal and regulatory authorities if required by law.

We will never sell or share your personal information with organisations so that they can contact you for any marketing activities. Nor do we sell any information about your web browsing activity.

## The type of personal information we collect

We currently collect and process some/all of the following information, depending on whether you:

- Are a client or user of our services (this includes referrals from partner organisations)
- Have contacted SASP for information/advice
- Are a member of a partner organisation (either in a delivery or advisory capacity)

  

- contact details: name, title, address, email addresses and telephone numbers
- emergency contact details for a friend or relative
- date of birth
- gender/ sex
- records of your interactions with us such as telephone conversations, emails and other correspondence, and your instructions to us
- details you provide about your experience in the activity
- records of your attendance, performance or feedback at any activities, competitions or workshops delivered by us or our partners
- images in video and/or photographic form and voice recordings (where separate permission has been sought)
- any payment or bank details you provide so that we can receive payments from you, or you can receive payments or funding from us, and details of the financial transactions with you
- any funding application details
- your marketing preferences so that we know whether and how we should contact you

## Children's personal data

Any Personal Data of children will have been requested from or provided by their Parent or Guardian, and not from the child. The contact details will always be those of the Parent / Guardian. The SASP website is restricted to age 14+, and we have added in an extra step for under 16's upon sign up that

it requires them to provide the details of their legal guardian and confirm that they have consent to create the account.

We may also collect, store, and use the following “special categories of personal information” of more sensitive personal information regarding:

- your race or ethnicity
- your health, including any medical condition, medical records, and health professional information

## **Legal basis for processing**

To process your personal data, we must have a lawful basis under Article 6 of the GDPR and under Article 9 if we are processing special category data. This will affect the lawful basis on which we rely to process your personal data, and that will be specified in the specific programme privacy notices.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided directly by you:

### **To create an account on our websites**

- sasp.co.uk
- saspchallenges.co.uk
- hhsomerset.co.uk
- inittogethersomerset.co.uk
- getoutsideinsomerset.co.uk
- activetoolkit.co.uk

### **To process payments using:**

- PayPal
- Stripe

### **As a member of staff working for one of our partner organisations:**

- In a delivery/advisory capacity
- For funding/SLA communication

We may also gather this information when you complete or submit a participant application, enrolment, or enquiry form to us, in electronic or paper form, or have spoken with us on the telephone or in person.

We have this personal information:

- to deal with your enquiries
- to assess your fitness to participate in any activity and how participation may affect your medical condition
- to make sure that the activity is specific to your health situation – for example GP Referral sessions, as we may need to be adapt the activity to enable participation
- to comply with Health and Safety legislation and law, and properly manage, organise, provide, and deliver safe and appropriate activities
- in the form of digital imagery, we have this imagery to promote activity in the region, our campaigns and events, and the work we do as a Regional Body
- provide information to you relating to the activity you are participating in, or to receive information on other activities, this can be by way of a newsletter which you will have opted in to.
- retain records to properly manage any business you have with us, e.g., audit / accounting purposes, complaints, insurance investigations or claims

We also receive personal information indirectly, from the following sources

- playwaze.com and gymcatch.com – activity booking websites

- our sports partners, sub-contractors, and external providers
- the Government or any regulators:
- Police, law enforcement and security services
- Medical Providers

We use the information that you have given us in order to

- register you to attend an activity run by us
- where we are required to do so by law or to assist with their investigations or initiatives
- to assist with the investigation and prevention of crime and the protection of national security
- to provide safe and appropriate activities and monitoring e.g., reporting back to GP for GP Referral Clients, or where we are working in partnership with medical providers to provide the service to you.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

- a) Your consent. You can remove your consent at any time. You can do this by contacting: Data Protection Officer, SASP, Chelston Business Park, Wellington, Somerset, TA21 9JQ or emailing [enquiries@sasp.co.uk](mailto:enquiries@sasp.co.uk).
- b) We have a contractual obligation.
- c) We have a legal obligation.
- d) We have a legitimate interest.

## How we store your personal information

SASP databases are kept and maintained within the UK. Personal information provided to some of our service providers may use cloud facilities and software, these are secure and held within the UK.

## How long do we retain your personal information

Personal data will only be kept for an identified, limited period of time following the end of an event or project. This will be outlined on our consent forms or notification communication. For physical activity sessions, retention periods are for the period in which the activity is running or in accordance with the funding body, such as Sport England. This can be up to a period of 3 years.

Financial, Legal and Safeguarding information is retained on a longer-term basis for legal purposes in accordance with usual commercial practice and regulatory requirements e.g., data regarding Safeguarding will be kept for a minimum of 7 years.

## How do we dispose of your personal information

We dispose of your personal information in the following ways:

- Shredding, if in paper form
- Decommissioning hard drives using a reputable company
- Deleting data from our cloud-based services

All methods provide a final and irretrievable way of removing your data from our organisation.

## Your rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information.
- Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances, for the purposes of direct marketing.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact: Data protection Officer SASP Chelston Business Park Wellington, Somerset, TA21 9JQ  
Phone Number: 01823 653990  
E-mail: [enquiries@sasp.co.uk](mailto:enquiries@sasp.co.uk)

## **Withdrawing your consent**

Please note that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent. We may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so, on a basis other than your consent.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a complaint to the: Data protection Officer SASP, Chelston Business Park, Wellington, Somerset, TA21 9JQ  
Phone Number: 01823 653990  
E-mail: [enquiries@sasp.co.uk](mailto:enquiries@sasp.co.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

website: <https://www.ico.org.uk>  
Helpline number: 0303 123 11