

# **Walsall FC Disabled Supporters Association**

## **PRIVACY POLICY & DATA PROTECTION**

Walsall FC Disabled Supporters Association ('WFCDSA') is an independent, not-for-profit, supporter organisation which is owned and operated by its members. Our registered address is Walsall FC DSA, 10 Christine Close, Tipton, West Midlands, DY4 0DU.

WFCDSA is a 'Data Controller', which means that we are responsible for determining the purposes and means whereby we process personal data in relation to you, and as such, we are fully committed to comply with the requirements of General Data Protection Regulations ('GDPR').

We need to collect and use information about the people with which we engage with, in order to operate and carry out our core functions, and regard the lawful and appropriate treatment of personal information as being integral to our operation, and to maintaining the confidence of those individuals, groups and organisations with which we engage. We will endeavour to deal appropriately, and in accordance with the principles of GDPR in relation to all personal information we collect, record and use, whether on paper, electronically, or by any other format.

The purpose of this document is to set out the policies, terms and processes, that WFCDSA will adopt to ensure that anyone working on behalf of the members of WFCDSA are cognisant with, and abide by the obligations imposed by GDPR.

### **1.0 The Principles of GDPR**

In order to comply with the six basic principles of GDPR, the way WFCDSA processes and uses your personal data must be:

- 1.1 Fair, lawful and transparent;
- 1.2 For a legitimate purpose;
- 1.3 Adequate, relevant and limited;
- 1.4 Accurate and up-to-date;
- 1.5 Such as to ensure that data is kept only as long as is necessary; and
- 1.6 Such as to ensure that it is kept secure at all times.

### **2.0 What does this policy cover?**

In carrying out our core functions, WFCDSA must engage with a number of parties; in particular, we engage with the following:

- 2.1 Members of the WFCDSA Management Committee;
- 2.2 Ordinary members of WFCDSA;

- 2.3 Level Playing Field, the leading advisory and campaigning organisation for disabled supporters across all sports;
- 2.4 Walsall Football Club; and
- 2.5 Friends and supporters of WFCDSA, both individual and corporate, who we engage with for the benefit of WFCDSA and its members.

### **3.0 What data and information do we collect?**

WFCDSA collects, records, and processes personal data and information from you when you join as a registered member of WFCDSA. This may include:

- 3.1 Your name;
- 3.2 Your date of birth;
- 3.3 Your postal address including post code;
- 3.4 Your email address;
- 3.5 Whether you consider yourself to have a disability or not;
- 3.6 The nature of your disability if you have one; and
- 3.7 A status which best describes you, if you don't consider yourself to have a disability.

### **4.0 How does WFCDSA use this information, and what is its legal basis for its use?**

WFCDSA processes, records, and uses your personal information for the following purposes:

- 4.1 In order to fulfil our core function and pursue our legitimate interests, in particular:
  - 4.1.1 We will use your personal information to manage and administer the WFCDSA membership;
  - 4.1.2 To communicate information with members of WFCDSA, in relation to general meetings, elections, events and activities;
  - 4.1.3 To ensure eligibility to vote at general meetings and elections;
  - 4.1.4 To ensure eligibility to stand for election to the Management Committee of WFCDSA, in accordance with the WFCDSA Constitution;
  - 4.1.5 To periodically send out newsletters to registered members of WFCDSA; and
  - 4.1.6 To determine future projects, development and objectives of WFCDSA, in order to improve disability facilities and/or services available to disabled supporters.
- 4.2 Where consent has been given:
  - 4.2.1 We may send you direct marketing and/or promotional material in relation to WFCDSA, Level Playing Field, and/or Walsall Football Club by email;

- 4.2.2 We may handle medical and/or disability information that you, your parent, or your care provider has provided us with, in order to ensure that WFCDSA supports you appropriately; and
- 4.2.3 Other occasions where your consent is required; reasons for which will be explained fully at the time.

## **5.0 Withdrawing consent, or otherwise objecting to direct marketing**

Wherever WFCDSA relies on your consent, you will always be able to withdraw that consent, unless we have legal grounds for processing your data for other purposes, such as those set out above. You have an 'absolute right' to opt out of direct marketing at any time by contacting WFCDSA via email to [walsallfcdsa@gmail.com](mailto:walsallfcdsa@gmail.com).

## **6.0 Who will WFCDSA share my personal data with, where, and when?**

WFCDSA will under no circumstances, share, sell, give, transfer, or exchange your personal data and/or information with any third party(s) unless:

- 6.1 We are required to do so by Government Authorities and/or law enforcement officials, if mandated by law, or if required for the legal protection of WFCDSA and our legitimate interests in compliance with applicable laws.
- 6.2 In the event that WFCDSA and all of its assets (including personal details in relation to registered members) becomes the legal and legitimate property of anyone other than the members of WFCDSA.

Where WFCDSA is required to share your personal details (strictly as stated above), all transfers of data, will be consistent with the principles of GDPR.

## **7.0 What are my right?**

WFCDSA is committed to ensuring that any personal data and/or information that we process, record, and use, is accurate and up-to-date, but it is up to you to inform WFCDSA of any changes to your personal information.

In certain circumstances, you have the following rights in relation to your personal data:

- 7.1 The right to be informed of how we use you data – Already covered in this document.
- 7.2 The right to request access to what data WFCDSA holds in relation to you – This should be done via email to [walsallfcdsa@gmail.com](mailto:walsallfcdsa@gmail.com).

- 7.3 The right to request a correction of the data that WFCDSA holds in relation to you – This should be done via email to [walsallfcdsa@gmail.com](mailto:walsallfcdsa@gmail.com).
- 7.4 The right to request removal of any data that WFCDSA holds in relation to you – This should be done via email to [walsallfcdsa@gmail.com](mailto:walsallfcdsa@gmail.com).
- 7.5 The right to object to the inclusion of information – Where WFCDSA is relying on a legitimate interest for processing your data; you have the right to object to the ways in which WFCDSA is using it.
- 7.6 The right to request the restriction of processing the data that WFCDSA holds in relation to you – You have the right to ask us to stop processing your data.
- 7.7 The right to portability of the data that WFCDSA holds in relation to you – You have the right to ask WFCDSA to transfer the data we hold in relation to you, over to use for your own purposes.
- 7.8 The right to request the transfer of the data that WFCDSA hold in relation to you – You have the right to request the transfer of any personal data that WFCDSA hold in relation to you, to another party.

These right 'may be limited', for example:

- 7.9 If fulfilling your request would reveal personal data about another person;
- 7.10 If you ask us to delete information which we are required by law to keep; or
- 7.11 If you ask us to delete information for which WFCDSA has compelling legitimate reasons to keep.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have any unresolved concerns that have not been addressed within a reasonable period of time, you have the right to complain to the Information Commissioner's Office (ICO). For more information, please visit the ICO website at <https://ico.org.uk>.

Some of the personal information we request must be provided on a mandatory basis in order for WFCDSA to accept you as a registered member and to lawfully check your eligibility to vote in elections and on other important WFCDSA issues, or to stand for election to the WFCDSA Management Committee, in accordance with the Constitution of WFCDSA. Other informational is optional, though if such information is not made available, WFCDSA may not be able to provide you with the appropriate assistance, services, or support.

## 8.0 How to contact us

WFCDSA can be contacted at any time via email to [walsallfcdsa@gmail.com](mailto:walsallfcdsa@gmail.com), or in writing to its registered address at: **Walsall FC DSA, 10 Christine Close, Tipton, West Midlands, DY4 0DU.**

## 9.0 How long will you retain my data?

We will retain some data for as long as you are a registered member of WFCDSA. This includes:

- 9.1 Your name;
- 9.2 Your postal address including post code;
- 9.3 Your email address;
- 9.4 Whether or not you consider yourself to have a disability;
- 9.5 The nature of your disability if you have one (and if provided); and
- 9.6 The status which best describes you if you don't consider yourself to have a disability.

This information is retained in order to administer membership administration, and to enable WFCDSA to communicate with you electronically in accordance to the terms set out in this document. Some of the information will also be retained in order for WFCDSA to provide you with appropriate assistance, services, and support whilst a registered member of WFCDSA.

Other data will be removed from our records as soon as you reach the age of 18 years old. This includes:

- 9.7 Your date of birth – which for the avoidance of doubt will only be used to confirm your eligibility to vote in elections and on other important WFCDSA matters, or stand for election to the WFCDSA Management Committee in accordance with the Constitution of WFCDSA.

If you choose to cease being a registered member of WFCDSA, all personal data in relation to you will be removed from our records with 28 days after receiving your membership cancellation notice.

PLEASE NOTE: In accordance to paragraph 7.4 of this document; you have the right to object to WFCDSA retaining any data in relation to you if you do not believe that there is a legitimate interest justifying its retention, though this will affect your ability to remain a registered member of WFCDSA.

## **10.0 Amendments to this document**

The Management Committee of WFCDSA, reserves the right to update or amend this document at any time and at its own discretion, providing it is done so a compliance with, and remains consistent with GDPR. It is your responsibility to check this document regularly, in order to make sure you understand, and agree to any amendments made.