

## Newcastle United Disabled Supporters Association (NUDSA)

### DATA PRIVACY POLICY

NUDSA 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.

NUDSA is committed to full compliance with the requirements of the General Data Protection Regulation ('GDPR'). We need to collect and use information about people with whom we engage with in order to operate and carry out our core functions. We regard the lawful and appropriate treatment of personal information as being integral to our operation and to maintaining the confidence of all those with whom we engage. We will endeavour to deal appropriately and in accordance with the principles of GDPR with all personal information we use however it is recorded and collected and whether it is on paper, in electronic records or any other format.

The purpose of this document is to set out the policies and processes we will adopt to ensure that all of us who have access to any personal data held by us as data users are cognisant with and will abide by the obligations imposed by GDPR.

#### **The GDPR Principles**

In summary, to comply with the **six basic principles** of GDPR the way we process personal data must be:

1. Fair, lawful and transparent;
2. For a legitimate purpose;
3. Adequate, relevant and limited;
4. Accurate and up to date;
5. Such as to ensure that data is kept only as long as is necessary; and
6. Such as to ensure that it is kept secure.

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

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

- Our committee members.
- Our individual members.
- Our organisational members.
- Our Friends and Supporters, both individual and corporate, who we keep in touch with for the benefit of the charity.

## What information do we collect?

We collect and process personal data from you when you join NUDSA as a member. This may include:

- your name
- your gender,
- your date of birth,
- your contact details including your home or business address, email address and phone number;
- your photograph;
- your medical conditions or disability information.

## How do we use this information, and what is the legal basis for its use?

We process this personal data for the following purposes:

1. As required by the us to fulfil our core function and pursue our **legitimate interests**, in particular:
  - we will use your information to manage and administer the NUDSA membership;
  - we will also use data to communicate information about events and activities;
  - we post out a quarterly newsletter called the Toon Times;
2. To fulfil a **contract**, or take steps linked to a contract: this is relevant where you book tickets for events or trips, or to renew membership. This may include:
  - taking payments;
  - communicating with you;
  - providing and arranging the delivery or other provision of products, prizes or services;
3. Where you give us **consent**:
  - we may send you direct marketing or promotional material by email;
  - we may handle medical or disability information you or your parent/guardian provide to us, to ensure we support you appropriately;
  - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

## Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent you will always be able to withdraw that consent unless we have other 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, or any profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this

is an electronic message, or by contacting us using the details set out below in the 'How do I get in touch with you?' section below.

### **Who will we share this data with, where and when?**

We may share your data with third parties where to do so would be consistent with the GDPR principles.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data may also be shared with third party service providers who will process it on our behalf for the purposes identified above. Such third parties might include the Charity Commission and any third party providers of data processing services we may use.

### **What rights do you have?**

We are committed to ensuring that any data we process is accurate and up to date. We will be dependent on you to make us aware of any changes to your personal information.

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

- the **right to be informed** of how we use your data – that is the purpose of this document.
- the **right to request access** to your data – to do so you should make a 'subject access request' to us.
- the **right to request correction** of your data – if any data we hold about you is incomplete or inaccurate you are entitled to require us to correct it.
- the **right to request erasure** of your data – if you would like us to stop processing your data you have the right to ask us to delete it where you believe that there is no proper basis for us to continue processing it.
- the **right to object to the inclusion** of information – where we are relying on a legitimate interest (or that of a third party) for processing your data you have the right to object to the way in which we are using it.
- the **right to request the restriction of processing** of your data – you have the right to ask us to stop processing your data.
- the **right to portability** of your data – you have the right to transfer the data we hold in respect of you for your own purposes.
- the **right to request the transfer** of your data – you have the right to request the transfer of the personal information we hold in respect of you to another party.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

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, you have the **right to complain** to the Information Commissioner's Office.

Some of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks or as required by the Charity Commission. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

For the avoidance of doubt, where we have required you to consent to our use of your data you also have the right to withdraw your consent at any time. We must comply with this request unless we have a legitimate reason for continuing to hold your data or we are under a legal obligation to do so.

### **How do you get in touch with us?**

We hope that we can satisfy any queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch with us at [info@nudsa.org](mailto:info@nudsa.org).

### **How long will we retain your data?**

Where we process personal data for marketing purposes or with your consent, we process the data for 3 years unless you ask us to stop when we will only process the data for a short period after this to comply with your requests. We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your wishes in future.

Where we process personal data in connection with performing a contract or fulfilling some other legal obligation, we keep the data for 6 years from your last interaction with us.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

Where we process personal data obtained in connection with an application for membership of NUDSA we will keep this data for six years from the date of the most recent application we have received on your behalf. As stated above, you have the right to object to us retaining this data if you do not believe that there is a legitimate interest justifying its retention.