



# **GDPR POLICY**

## **1. INTRODUCTION**

We at Rugby League Cares (registered charity number 1150763), registered office Red Hall, Red Hall Lane, Leeds, LS17 8NB (“we”, “our” or “us”) are committed to respecting your privacy and want to make sure all the personal information we have collected about you is safe and secure.

This Policy set outs our commitments to you, in compliance with the General Data Protection Regulation (commonly known as the “GDPR”) and explains how we collect, store and use your personal information.

Collecting specific, relevant personal information is a necessary part of us providing an excellent service to our beneficiaries, partners and supporters. When we hold or use your personal information, we will provide you with details covering what information we hold, how your personal information may be used, the basis for this use and details of your rights.

Where we collect personal information from you directly, we will provide or signpost you towards this information at the time we collect the personal information from you. Where we receive your personal information indirectly, you will either receive this information at the time your personal information is collected, or when we first contact you.

## **2. HOW DO WE PROCESS YOUR PERSONAL INFORMATION?**

In most cases we will be a data controller of your personal information. A data controller controls how personal information is processed and used. We will use your personal information as described in section 6 below.

A data processor processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller. In any case where we are not a data controller, this means that you cannot exercise your rights against us directly, but you can do so against the data controller (i.e. the person who controls how we process the personal information). In these cases, we will inform you who is the data controller of your personal information so that you can direct any such requests to them.

### **3. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

#### ***PLAYERS/RETIRED PLAYERS***

If you are a player who has registered his/her interest in participating in the sport competitively, you may also provide us with, or we may obtain, the following additional personal information from you:

- details of any club and/or league and/or other membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, gradings or ratings, competition results;
- any details required for the purposes of awarding funding or grants (including any means testing);
- any details to support players in preparing for a career after playing, to monitor welfare standards at clubs and to allow us to notify players when training and/or education courses or work experience/employment opportunities become available.

### **4. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

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

- information about your race or ethnicity, religious beliefs and sexual orientation; and
- information about your health, including any medical condition, health and sickness records, medical records and health professional information.

It may be that we do not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defense of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

## 5. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you sign up to join one of our Grants programmes, apply to become a member of RL Cares, make a query or when you correspond with us by phone, e-mail or in some other way.

## 6. HOW WE USE THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and the lawful basis for being able to do this.

### MEMBERSHIP/ALL INDIVIDUALS

Purpose	Personal Information Used	Lawful Basis
To administer any membership account you have, manage the relationship with you and dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us. Where appropriate, you have given us your explicit consent to do so.
To send you information which is included within a membership benefits package, including details about events.	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us. Where appropriate, you have given us your explicit consent to do so
To send you other marketing information you might find useful or which you have requested, including newsletters, information about Membership and events	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.

Purpose	Personal Information Used	Lawful Basis
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.
The security of IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.

## GRANTS PROGRAMMES

Purpose	Personal Information Used	Lawful Basis
For providing reports to our Grants programmes funding partners	All contact and participation details, health and medical history	This is necessary to enable us to properly manage and administer your participation in one of our programmes. Where appropriate, you have given us your explicit consent to do so.
To send you follow up surveys	Contact details	This is necessary to enable us to properly evaluate the success of our projects. Where appropriate, you have given us your explicit consent to do so
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate.	Health and medical history	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.

## PLAYERS & RETIRED PLAYERS

Purpose	Personal information used	Lawful basis
To assess your eligibility for and to provide any scholarship funding and/or grants	All details required for the purposes of awarding scholarship funding or grants (including any means testing)	This is necessary to enable us to properly administer and perform any contract for the provision of funding.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate.	Health and medical history	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To support you in preparing for a career after playing, to monitor welfare standards at your club and to allow us to notify you about training and/or education courses or work experience/employment opportunities.	All contact and participation details, health and medical history	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To invite you to attend matches or events	Contact details	We have a legitimate interest in notifying you, as a former player, about forthcoming matches and/or events you may be interested in attending

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in section 16 below.

Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## **7. DISCLOSURE OF YOUR PERSONAL INFORMATION**

Generally we share information where we need to do so in order to run our organisation (e.g. where we are required by one of the organisation's major funders to share an update on the progress of a project they are funding). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

We share personal information with the following parties:

- Any party approved by you or notified to you at the point of data collection;
- Other service providers: for example payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including CRM, website, video and teleconference services);
- Our supply chain partners and sub-contractors, such as couriers, import/export agents and shippers;
- The Government, major funders or our regulators: where we are required to do so by law or to assist with their investigations or initiatives;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security;
- Certain parties who act as joint Data Controllers or Data Processes in relation to services that we provide. You will be notified where this is the case;

We do not disclose personal information to anyone else except as set out above.

## **8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

We will only hold your information for as long as is necessary. Where you ask us to delete records, we may delete it earlier, subject to any retention requirements.

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

## **9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in section 14 below.

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;

Whilst this Privacy Policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

If you are unhappy with the way we are using your personal information, we are here to help and would encourage you to contact us to resolve your complaint by using the contact details set out in section 14 below.

## **10. LINKING WITH THIRD PARTY SITES**

Our Site may, from time to time, contain links to and from the websites of our commercial partners, the RFL, Super League, advertisers and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party

site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

## **11. SECURITY**

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

We take information and system security very seriously indeed and we are certified to ISO/IEC 27001 and ISO/IEC 27018. Where third-party providers store data on our behalf, we endeavour to ensure they are certified to ISO levels and/or comply with industry best practice.

## **12. LOG FILES**

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

## **13. CHANGES TO THIS POLICY**

You are encouraged to check back regularly for updates to our Privacy Policy, as we may make changes at any time. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in section 14 below.

## **14. CONTACT**

In the event of any query or complaint in connection with the information we hold about you, please email [info@rlcares.org.uk](mailto:info@rlcares.org.uk) or in writing to RL Cares, Red Hall, Red Hall Lane, Leeds, LS17 8NB.