



**P R E P 4 S P O R T**

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## Prep4Sport Data Privacy Notice      September 2022

We have created this Privacy Notice in order to demonstrate our firm commitment to your privacy. Data Protection Law gives individuals rights to understand how their data is used. You are encouraged to read this text and understand P4S' obligations to its customers.

This notice explains how Prep4Sport ("P4S", "we" and "our") uses ("processes") personal data we collect about our prospective, current and former customers. It applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form. It also applies in addition to other relevant terms and conditions and policies.

Anyone who works for, or acts on behalf of, P4S (including staff, volunteers and service providers) should also be aware of and comply with P4S' Data Protection policy, which provides further information about how personal data will be used.

### **OUR WEBSITE**

Our websites use cookies, a small piece of information stored on your computer in the form of a file, to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. We use Google Analytics to analyse use of our websites. The information collected will not include any information from which you will be identifiable. You can set up your browser to reject cookies, although some functionality of the website may be impaired.

Should you wish to contact us, you will be asked to submit some personal information (e.g. your name and email address). By entering your details in the fields requested, you enable us to provide you with information you require. We do not share this information with external

bodies. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## WHAT TYPES OF PERSONAL DATA DOES P4S USE?

This will include by way of example:

- e-mail addresses and other contact details for teachers at participating schools
- car details (about those who use tournament car parking facilities);
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- correspondence with and concerning staff, pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in tournament activities,

## HOW DOES P4S OBTAIN MY PERSONAL DATA?

P4S receives personal data from the individual directly (including, in the case of pupils, from their parents/teachers). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments). The main source of data is from participating school's teachers.

## WHY DOES P4S USE PERSONAL DATA?

We need to use personal data for the events to run efficiently, safely and to let others our service partners know how to do the same. Some of this activity P4S will need to carry out in order to fulfil its legal rights, duties or obligations – such as inform the hotel of dietary requirements and medical needs.

Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The school expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- To safeguard players' welfare and provide appropriate pastoral care;
- To make use of photographic images of player's on the P4S website; we will not publish photographs of individuals alongside their names without the agreement of the appropriate individual; **there is an 'opt out' tick box on initial registration**
- To carry out or cooperate with any P4S or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for P4S's purposes, including to obtain appropriate professional advice and insurance for the school.

## WHO ELSE SEES MY PERSONAL DATA?

For the most part, personal data collected by P4S will remain within P4S records, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical information
- pastoral or safeguarding files.

Staff, players and parents are reminded that the school is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police.

## HOW LONG DO YOU KEEP PERSONAL DATA?

P4S will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact us at [info@prep4sport.co.uk](mailto:info@prep4sport.co.uk). However, please bear in mind that P4S will often have lawful and necessary reasons to hold on to some personal data even following such request. In particular, even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

## ARCHIVES

Records considered to be of historic value are kept indefinitely. Personal data concerning living individuals, which is not in the public domain, is unavailable to researchers, unless the subject of the information provides written permission.

## RESPONSIBILITY FOR DATA PROTECTION

P4S' owner has responsibility for Data Protection. He handles requests and enquiries concerning the company's uses of your personal data (see section on Your Rights below) and endeavours to ensure that all personal data is processed in compliance with the school's Data Protection policy and Data Protection Law.

## YOUR RIGHTS

## RIGHTS OF ACCESS, ETC.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by P4S, and in some cases ask for it to be erased or amended or have it transferred to others, or for P4S to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to P4S.

P4S will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

P4S will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, P4S may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

### REQUESTS THAT CANNOT BE FULFILLED

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by P4S, or documents prepared in connection with a legal action).

### CONSENT

Where P4S is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are: types of uses of images, certain types of fundraising activity. Please be aware however that P4S may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

## DATA ACCURACY AND SECURITY

P4S will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify their school of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please contact your child's school for details of why their school may need to process your data, of who you may contact if you disagree.

P4S will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to systems.

## QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to P4S. Please email:

[info@prep4sport.co.uk](mailto:info@prep4sport.co.uk)

If an individual believes that P4S has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the appropriate ombudsman. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the company before involving the regulator.

