



**South West Football Academy
SWFA**

Data Privacy Policy

Keeping your information safe

Overview

We take your privacy very seriously.

So please take the time to see what we're doing with your personal information and how we're keeping it secure. It's all here in our **Privacy Promise** and **Privacy Policy**.

Our Privacy Promise

Our privacy promise covers how we treat your information and lets you control what happens to it. It's based around three main areas...

Transparency

We will always explain clearly what information we're collecting about you and why. If we ask for your information we will:

- make sure you know why we need it
- only ask for what we need
- keep it securely
- let you know if we share it with others
- only keep it for as long as we need to
- not make it available for marketing purposes without your consent

Choice

We respect your right to make informed decisions about your information. Fair information processing means you have control over how your data is used. You can find out more about how we can help you to do this below.

Integrity

Your trust in us is very important, so we're committed to keeping your information safe and secure. We will only use your information to improve services to you, communicate with you, and fulfil our legal obligations as a registered charity. In return, we ask you to:

- give us accurate information
- tell us as soon as possible if there are any changes such as a new phone number or email address

This helps us keep your information reliable and up to date.

Our Privacy Policy

1. Data Control

The Controller for the processing of any personal information as outlined in this privacy policy is South West Football Academy (SWFA).

2. Information we collect

You may provide us with the following types of Personal Data when you interact with us (when using our digital platforms or otherwise):

- Identity – first name, surname, gender, date of birth
- Contact – email address and address
- Financial – payment card details, billing address, purchase information, payment history
- Profile – username, profile image
- Images and/or film of participants for publicity purposes

We may collect Sensitive Personal Data from you, including:

- Any relevant medical conditions and/or disabilities
- Ethnicity
- Criminal records
- Sexual orientation
- Religion

3. Online browsing information and cookies

We may also collect the following types of information from you when you use our digital platforms (using Cookies or other tracking technologies):

- Usage – information about how you use our digital platforms, including time spent on page, click-throughs, download errors
- Technical – IP address, browser type, hardware type, network and software identifiers, device information, operating system and system configuration

We may also receive information about you from third parties, including our partner schools, funders, other service providers, social media platforms and law enforcement agencies.

4. Our Tasks

SWFA uses the information collected from you for purposes including the following:

- to provide you with products and services you request
- to administer competitions or promotions that you enter into
- to process payments that you make through our digital platforms
- for internal administration and record-keeping
- to notify you of changes to this Privacy Notice, our terms and conditions or other changes to our services or products

- to answer your enquiries which may involve contacting you by post, e-mail or phone
- to keep you informed about our activities and services, the work we do, and how we are performing against our objectives
- to contact you about third-party products and services which we believe may be relevant to you or pass your details on to third parties to contact you directly about the same (in each case, only where you have consented to hear about these)
- to send you certain types of direct marketing
- to improve and personalise your experience of our digital platforms by delivering more relevant content and advertising whilst you browse
- to administer our digital platforms, including troubleshooting, testing and analysis and to enable you to participate in interactive features of our digital platforms
- to manage legal claims and other compliance/regulatory matters
- to verify your identity and detect and prevent fraud and security issues
- to allow you to provide us with feedback through reviews and surveys
- to process job applications

In addition to the above, we may also anonymise and aggregate your personal data in a way which means you cannot be identified. This may be helpful to us for carrying out research and general data analysis. Because this data is not personally identifiable, we can use it for any purposes.

5. What is our legal basis for processing your Personal Data?

We use your Personal Data on the following bases:

- To perform a contract, such as providing products or services to you
- To comply with legal and regulatory obligations
- For legitimate business purposes (see "Our Tasks" section above)
- In certain cases, with your consent (eg if we want to use images or film of participants for publicity purposes)

We may process your Data for more than one lawful basis depending on the specific purpose for which we are using it. Importantly, we will only use your Data when the law allows us to.

6. Who do we share your Personal Data with?

We may pass on your Data to government or regulatory authorities or law enforcement officials to assist with their requests and comply with our legal obligations.

We will not pass on your Data to any third party to market their products/services to you unless we have obtained your consent.

7. Do we send your Personal Data outside the EEA?

The European Economic Area or "EEA" is deemed to have good standards when it comes to data privacy. As such, we consciously limit the occasions when we may need to transfer or handle your Personal Data outside of the EEA. Where we do, for example where our service providers are based outside of the EEA, we make sure that your Personal Data is still treated fairly and lawfully in all respects (including making sure we have a legal ground for sending your data outside the EEA and putting in place all necessary safeguards for such arrangement).

8. What is our Personal Data retention policy?

We will keep your Personal Data for as long as you are a registered participant. Following your last engagement with SWFA we will keep your Personal Data for six years, after which your data will be anonymised or deleted. For financial data we will keep this for seven years after your last engagement with us. Images and films will be kept and used for a maximum of three years after which they will be destroyed or permission sought for their continued use.

9. How do we keep your Personal Data secure?

We adopt a security process to ensure your data is kept safe and secure and to prevent unauthorised access use or loss of your data. We also make sure that third parties who need to handle your data when helping us to deliver our services are subject to suitable confidentiality and security standards.

Despite the security measures we implement, please be aware that the transmission of data via the internet is not completely secure. As such, we cannot guarantee that information transmitted to us via the internet will be completely secure and any transmission is at your own risk.

Our internal 'Data Protection Policy' sets out the principles and procedures that SWFA, our employees, volunteers, agents and contractors must follow when processing personal data.

10. Your Individual Rights

If we hold information about you, you have specific rights about that information. You have the right to;

- know how we use your personal data
- access your personal data
- have your personal data corrected if it is inaccurate or incomplete
- in some limited cases, ask us to delete your personal data when we no longer need it
- ask us to restrict how we process your data
- get your data from us and re-use it across other services
- object to certain ways we use your data
- be safeguarded against risks where decisions based on your data are taken entirely automatically
- tell us your preferred frequency, content and format of our communications with you

If you want to exercise any of these rights, please contact us at jackp@southwestfa.co.uk

You don't have to pay a fee to exercise your rights unless your request is unfounded, repetitive or excessive (in which case we can charge a reasonable fee). Alternatively, we may refuse to comply with your request in these circumstances.

Where your request is legitimate, we will always respond within one month (unless there is a legal reason to take longer, such as when your request is particularly complex). We may also need you to confirm your identity before we proceed with your request if it is not clear to us who is making the request.

11. How to opt-out of marketing

To unsubscribe from Our newsletters or any other marketing emails, you simply need to click on the unsubscribe link at the bottom of the relevant communication you have received. Alternatively, please contact us at jackp@southwestfa.co.uk to opt out of these communications.

12. Job applicants, current and former employees

When you apply to work for us, we will only use the information you give us to process your application and to monitor recruitment statistics. As part of our external recruitment process, your personal information may be shared with nominated agents.

Where we disclose information to any other third parties, (for example where we want to take up a reference or obtain a 'disclosure' from the Disclosure and Barring Service or Disclosure Scotland), we will not do so without telling you first, unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held on file for 1 year after the recruitment exercise has been finished, it will then be destroyed or deleted. We retain anonymised statistical information about applicants to inform our recruitment activities, but no individuals can be identified from that data.

When you work for us, we will compile a file relating to your employment. The information contained in this will be kept in a secure location and will only be used for purposes directly relevant to your employment. Your information may be shared with third parties including:

- HMRC
- pension administrators

If you work with us under 'self-employment' terms, the above may or may not apply.

Once your employment with us has ended, we will keep your file until it is no longer needed. It may be kept for pay, pensions, health and safety, medical and other employment reasons and potentially for up to 7 years.

13. Disclosure of personal information

You can also get information about:

- agreements we have with other organisations for sharing information
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics
- our instructions to staff on how to collect, use and delete personal data
- how we check that the information we hold is accurate and up to date.

14. Further information

a. How to contact us or make a complaint to us

If you want to exercise any of your rights, request information about our privacy policy, know more about the information we hold about you or make a complaint about how we've handled your information, you can email us at jackp@southwestfa.co.uk

b. Complaints

You have a right to complain to us, however, where possible, we would really appreciate you speaking with us first if you have any concerns.

If you want to complain about how we have handled your information you can report it to jackp@southwest.co.uk

15. Changes to this privacy policy

If we amend our Privacy Notice, it will be published on the relevant digital platform(s) so please check back regularly to see if there have been any updates. If we make any substantial changes, we may also email you if it's appropriate.

This privacy policy does not cover the links within this site linking to other websites. We keep our privacy policy under regular review. This privacy policy was last updated on 10/12/2024