



Privacy Policy

Privacy Policy Overview

Welcome to *Take Her Lead (THL)* privacy policy. This privacy policy aims to give you information about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

1. Definitions

“Personal data” means any information about an individual from which that person can be identified. It can be stored electronically or on paper, and includes images and audio recordings, as well as written information.

“THL Workforce” refers to employees, contractors, mentors acting on behalf of THL, and relevant partner representatives.

2. Responsibility

Overall and final responsibility for data protection lies with the CEO of THL, who is responsible for overseeing activities and ensuring this policy is upheld.

All members of the THL workforce are responsible for observing this policy, and related procedures, in all areas of their work for THL.

3. Overall policy statement

THL may need to keep personal data about its supporters, partners, mentors, volunteers, survey respondents, event attendees and programme participants in order to carry out its activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people’s privacy and comply with the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (UK GDPR) and other relevant legislation.



We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- (i) Identity Data: includes names, gender, age, racial or ethnic origins and health data.
- (ii) Contact Data: includes email address, postcode, address, telephone number.
- (iii) Organisational Data: includes details of the organisation to which you are affiliated and the length of time to which you have been connected with the organisation.
- (iv) Technical Data: includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- (v) Marketing and Communications Data: includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- (vi) Event Attendees and Programme Participation: If you are involved in one of our events or participate in one of our programmes in any capacity (including, but not limited to: participant, mentor, athlete, volunteer, coach, official, deliverer etc) we may also request the following additional personal information from you:
 - identification documents, such as passport, driving licence and identity cards etc;
 - professional details, such as qualifications, accreditations and experience;
 - contact details of others, such as parents/guardians, next of kin, family members, coaches, carers and emergency contacts;
 - specific details, such as gender, date of birth, kit size, preferences
 - travel information.
- (vii) 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, gender identity, sexuality, socioeconomic status;
 - information about your health, including any disabilities, medical conditions and history, injuries, allergies, medication, immunisations and health professional information;
 - dietary and access requirements.

We may not collect all 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:



- you have given explicit consent (e.g. by providing that information to us);
- the processing is necessary to inform THL's projects, programmes and initiatives;
- the processing is necessary for reasons of substantial public interest, equality of opportunity or treatment;
- the processing is necessary for the establishment, exercise or defence of legal claims;
- the processing is necessary for the provision of health care or treatment; or
- the processing is necessary for scientific research or statistical purposes in the public interest.

We will only collect, store and use data for:

- (i) purposes for which the individual and/or supporter organisation has given explicit consent.
- (ii) purposes that are in our organisation's legitimate interests.
- (iii) the purpose of promoting and marketing our work. Adults of 18 years of age and above will always have a choice and an opt-out process will be provided. For specific photo/video shoots we will obtain your consent. Young people under 18 years of age, where we have obtained parental consent to do so.
- (iv) contracts with the individual whose data it is.
- (v) to comply with legal obligations.
- (vi) to protect someone's life.
- (vii) to perform public tasks.

Our legitimate interests mean the interest of the organisation in conducting and managing the organisation to better understand, develop and advocate for sport for development and to enable us to give you the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the following rights:

- (i) Request access: we will provide individuals with details of the data we have about them when requested by the relevant individual (subject access request). We will respond to all subject access requests and other requests within one month.



(ii) Request correction: we will correct any incomplete or inaccurate data we hold about an individual.

(iii) Request erasure: we will delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data from our records.

(iv) Object to processing: you have the right to object to processing of your data where we rely on our legitimate interests and it impeaches your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes.

(v) Request restriction: you may ask us to suspend the processing of your personal data in certain circumstances.

(vi) Request the transfer: you may ask for the transfer of your personal data to a third party.

(vii) Withdraw consent at any time: where we are relying on consent, you can withdraw your consent at any time.

(vii) Right to complain: you have the right to complain to the Information Commissioner's Office (ICO) for any breach of your rights by us and other organisations.

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for. We may retain your personal data for a longer period where we need to keep it for legal reasons.

We will endeavour to keep personal data up-to-date and accurate.

We will store personal data securely.

We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so. Where we share your personal data with a third party, we require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our data sharing agreement.



We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our team and employees to follow.

4. Review

This policy will be reviewed every two years.

Data protection procedures

1. Introduction

THL has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

2. General procedures

Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third party website (e.g. Google Drive) we will ensure the third party complies with the UK GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper data is shredded.

We will keep records of consent given for us to collect, use and store data. These records will be stored securely.



3. Mailing list

We will maintain a mailing list. This will include the names and contact details of people who wish to receive updates and information from THL.

When people sign up to the list, we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give consent to receive updates and information and will only send them messages which they have expressly consented to receive through signing up.

We will not use the mailing list in any way that the individuals on it have not explicitly consented to.

You can ask us to remove you from our mailing list at any time. We will provide information about how to be removed from the list with every mailing.

We may use mailing list providers who store data within the EU (for example Survey Monkey). Whenever we transfer your personal data outside of the UK, we will ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- (i) we will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.
- (ii) we may use specific contracts approved for us in the UK which gives personal data the same protection it has in the UK.

4. Contacting supporters and mentors

We will maintain a list of contact details of our partners, workforce, ambassadors, directors and funders.

People will be removed from the list if they have ceased to be a partner of or affiliated with THL.

When contacting people on this list, we will provide a privacy notice which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.



To allow partners to work together, it is sometimes necessary to share an individual's contact details at a given partner organisation with other individuals within the organisation or wider team. We will only do this with explicit consent in accordance with our data sharing agreement.

5. Contacting individual partners

The directors and working groups who govern THL and deliver our collective action need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.

Board and working group contact details will be shared among the board or working group.

The board or working groups will not share each other's contact details with anyone outside of their group, or use them for anything other than THL's business, without explicit consent.

6. Review

These procedures will be reviewed every two years.