



SPORTAINMENT – DATA PROTECTION & PRIVACY POLICY (2025)

Covering Sportainment, Spor-X & SportPharma UK Registered Charity: 1208190

Effective Date: 14/05/2025 Last Updated: 14/05/2026 Next Review: Annually

1. Purpose of This Policy

Sportainment and its global divisions — **Spor-X** (finance & tech talent) and **SportPharma** (science & innovation) — are committed to protecting the privacy, rights, and personal data of all children, young people, adults, partners, staff, and volunteers.

This combined **Data Protection & Privacy Policy** explains:

- What data we collect
- How we use it
- How we store and protect it
- Who we share it with
- Your rights under **UK GDPR** and the **Data Protection Act 2018**

It applies to all Sportainment operations worldwide.

2. Information We Collect

2.1 Personal Data

- Name, contact details, date of birth
- Parent/carer details (for youth programmes)
- Professional background (Spor-X talent)
- Application and enrolment information

2.2 Usage Data

- Website interactions
- Preferences
- Analytics and cookies

2.3 Financial & Transaction Data

- Sponsorship payments
- Donations
- Programme fees
- Financial records required by law

2.4 Health & Wellbeing Data

- Medical information for youth programmes
- Allergies, conditions, medication
- Scientific or wellbeing-related data (SportPharma)
- Safeguarding information

3. Lawful Basis for Processing

We process data under:

- **Consent** – photos, marketing, optional data
- **Contract** – employment, volunteering, programme enrolment
- **Legal obligation** – safeguarding, DBS, financial reporting
- **Vital interests** – emergencies
- **Public task** – publicly funded programmes (e.g., HAF)
- **Legitimate interests** – programme evaluation, talent placement, partnership management

4. How We Use Your Information

4.1 Sportainment (Youth Programmes)

- Delivering safe sport, creative arts, STEM, tutoring, life skills, and wellbeing sessions
- Managing attendance and safeguarding
- Communicating with parents/carers

- Evaluating impact and reporting to funders (anonymised where possible)

4.2 Spor-X (Finance, Law & Tech Talent)

- Providing access to career opportunities
- Facilitating mentorship and training
- Connecting talent with industry partners
- Supporting global recruitment pathways

4.3 SportPharma (Science & Innovation)

- Supporting scientific collaborations
- Managing research partnerships
- Ensuring compliance with ethical and regulatory frameworks

4.4 General Use Across All Divisions

- Improving services and user experience
- Maintaining secure operations
- Meeting legal and regulatory requirements

5. Sharing of Information

We do **not** share, sell or rent any personal data.

Only the minimum necessary data is shared.

6. Data Security & Storage

We use strong security measures, including:

- Encrypted digital storage
- Password-protected systems
- Access controls for staff on a need-to-know basis
- Secure disposal of paper records
- Regular audits and compliance checks

We comply with:

- **UK GDPR**
- **Data Protection Act 2018**
- **ICO guidance**

- **Global data protection standards** (for Spor-X & SportPharma operations)

7. Data Retention

We retain data only as long as necessary:

- **Youth records:** 7 years after last contact
- **Safeguarding records:** 75 years
- **Staff/volunteer records:** 6 years after leaving
- **Financial records:** 7 years
- **Photos/videos:** Until consent withdrawn or 3 years

8. Individual Rights

You have the right to:

- Access your data
- Correct inaccurate data
- Request deletion (where appropriate)
- Restrict processing
- Object to processing
- Withdraw consent
- Request data portability

We respond within **one month**.

9. Children & Vulnerable Young People

Because Sportainment works with disadvantaged and care-experienced youth, we apply enhanced protections:

- Data minimisation
- Strict access controls
- Trauma-informed handling
- Alignment with our Safeguarding Policy
- No unnecessary sharing of sensitive information

10. Data Breaches

A data breach includes loss, theft, unauthorised access, or accidental disclosure.

Sportainment will:

- Investigate all breaches
- Notify affected individuals where there is risk
- Report serious breaches to the **ICO within 72 hours**

11. Photography & Media

We obtain **explicit consent** before using photos or videos of young people or adults.

Consent can be withdrawn at any time.

12. International Data Transfers

For Spor-X and SportPharma global operations, data may be transferred internationally.

We ensure:

- Adequate safeguards
- Standard contractual clauses
- Compliance with local regulations

13. Contact Us

For privacy-related inquiries:

Data Protection Lead Sportainment Email: legendsaremade@sportainment.org.uk

14. Policy Approval

This policy is approved by the Board of Trustees and applies to all Sportainment, Spor-X, and SportPharma activities.

Sportainment (Charity No. 1208190)