



## **Claygate Recreation Ground Trust(CRGT)**

### **Privacy Policy**

This Privacy and Cookie Policy sets out the basis on which we will process any personal data we collect from you or that you provide to us. Please read it to understand how we use and protect your personal information. This policy may change from time to time so please check it periodically. It was last updated on 27<sup>th</sup> May 2018.

This Privacy Policy relates to personal data collected by CRGT via its website, mail correspondence, emails, telephone calls or in person. CRGT is committed to protecting your personal information and being transparent about what information we hold about you. Using personal information allows us to develop a better understanding of the users of our services and our patrons and in turn to provide you with relevant and timely information about the work that we do. As a charity, it also helps us to engage with potential donors and supporters.

The purpose of this policy is to give you a clear explanation about how we use the information we collect from you directly and from third parties. We use your information in accordance with all applicable laws concerning the protection of personal information. This policy explains:

- What information we may collect about you
- When and how we may use that information
- In what situations we may disclose your details to third parties
- Our use of cookies to improve your use of our website
- How we keep your personal information secure
- How long we maintain it for and your rights to be able to access it

#### **1. Contacting Claygate Recreation Ground Trust**

For the purpose of the General Data Protection Regulation (GDPR) , the data controller is Claygate Recreation Ground Trust (Charity Number: 1067839). If you want to know what information we hold about you or if you have any other queries in relation to this Privacy Policy, our contact details are as follows:

Postal Address:

Claygate Recreation Ground Trust  
23 Dalmore Avenue  
Claygate  
Esher  
Surrey  
KT10 0HQ

Email: [secretary@crgt.co.uk](mailto:secretary@crgt.co.uk)

**Please note:** If you wish to opt out of any communication or amend your contact preferences, you can do so by contacting us as per the details above.

#### **2. What Personal Information We Collect**

2.1 When you visit the CRGT website or contact us via email, post, telephone or otherwise, you are agreeing to the terms and conditions of this Privacy Policy.

2.2 The personal information which you provide about yourself (via the CRGT website or by corresponding with us by telephone, email, post or otherwise) may include your name, address, email

address, telephone number, country of residence and financial details. This information will be held on our system and used for operational purposes only.

In order to process a transaction, your personal information may be passed to third party service providers.

2.3 Young people – for young people aged 18 or under we may ask for extra information, such as the young person's name, date of birth, school, parent or guardian's name, address, email, emergency contact, any relevant disability or health issues, photo/filming consent, as it is our legitimate interest to provide a safe environment for all users of our services. If the person is under 18, we will also ask for the parent or guardian's consent. This information will be held on our system and used for operational purposes only.

2.4 Special categories of personal data – data protection law recognises that certain categories of personal information are more sensitive such as health information, race, religious beliefs and political opinions. We do not usually collect this type of information unless there is a clear reason for doing so. For example, we may collect health information/ specific access requirements in line with our legitimate interest to provide a safe environment for users of our services. When processing this data, we will always ask for your consent first.

2.5 When visiting the CRGT website you are given the opportunity to opt in to receiving news and information from CRGT. The personal information you supply to us when you opt in to marketing communications will be used by CRGT to keep you up-to-date with our work, events, fundraising and volunteering opportunities.

When you opt in to marketing communications you may also be given the opportunity to opt in to receiving information from other organisations. CRGT will only pass on your personal information for marketing purposes if the relevant box has been ticked.

Please note you can amend these preferences at any time by emailing [secretary@crgt.co.uk](mailto:secretary@crgt.co.uk)

2.6 We may collect generic information about your visits to and use of the CRGT website such as your IP addresses, geographical location, browser type, referral source, length of visit and number of page views. Individual users will not be identifiable from this information and we may use this information for a number of purposes including, but not limited to, optimising the use of the Site, disclosing to third party contributors or for security purposes. In particular, we may use an analytics service provider for website traffic analysis and reporting and to track information such as which browser, screen resolution and IP address you are using to access our website, in addition to tracking your movements around our website.

2.7 We may receive some information that you submit to any third party website that you access from a link contained in the CRGT website. Both we and the owner or operator of that third party site will be the data controller in respect of any such information and you should check the Privacy Policy of that website to find out how they will use your data. We will only use that information in accordance with this Privacy Policy.

### **3. The Legal Basis We Rely On To Process Your Personal Data**

According to current data protection laws, there are a series of bases under which we may process your data. These include:

3.1 Contractual obligations – if you were to make a purchase from us, you are entering into a contract with us. In order to perform this contract, we need to process and store your data.

3.2 Legitimate interest – In certain situations (when you make a donation for example) we collect and process your personal information to pursue our legitimate interests in a way which might be reasonably expected as part of running our business and which does not materially impact your rights, freedom or interests. Please see paragraph 5. *Disclosure of your information* to check where we may use this basis for processing.

3.3 With your explicit consent – In certain situations, where the two bases above are not appropriate, we will instead ask for your explicit consent before using your personal information. For example, when you tick an opt-in box to receive specific communications. When collecting your personal data, we'll always make clear to you which data is necessary in connection with a particular service.

3.4 Legal compliance – If the law requires us to, we may pass on details of people involved in fraud or other criminal activity which may affect the CRGT.

Less commonly, we may process your personal information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.

#### **4. How and Why We Use Your Personal Information**

4.1 We will only use your information for the following purposes:

- (a) mailing list subscriptions
- (b) to provide you with marketing communications, news and information by post, email, SMS/MMS and/or phone about our work, services and events that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- (c) to provide you with marketing communications by post, email, SMS/MMS and/or phone about services and news and communications of other third parties that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes;
- (d) to conduct fundraising activities and to promote the charitable interests of CRGT, where you have consented to be contacted for such purposes;
- (e) to administer giving and membership schemes, when you sign up to them;
- (f) to ensure that our fundraising resources are applied in an effective and efficient manner, and that any communications we may send you are appropriate and will be of interest;
- (g) to allow you to participate in interactive features of our website, when you choose to do so;
- (h) to provide customer service in relation to your use of the CRGT website, to deal with enquiries and complaints and to notify you about changes to our services;
- (i) to administer, support, improve and develop our website, ensuring that its content is presented in the most effective manner for you and for your computer;
- (j) to send you general (non-marketing) communications, such as information about the website and services provided to you by us at that time (eg) updates to this Privacy Policy;
- (k) to internally monitor users' use of the website to enable us to analyse audience make-up and other site behaviour in order to determine what other services and events you may be interested in and in order to assist us improve our business generally;
- (l) to provide third parties with statistical information about our users but this information will not be able to be used to identify any individual user;
- (m) to send you (non marketing) communications required by law;
- (n) to identify and prevent fraud or any other criminal activity.

#### **5. Disclosure of Your Information**

5.1 Other than as expressly set out in this Privacy Policy or as otherwise required or permitted by law, we will not share, sell or distribute any of the information you provide to us without your consent.

5.2 Direct marketing – we aim to communicate with you about the work that we do in ways that you find relevant, timely and respectful. To do this we use data that we have stored about you as well as any preferences you may have told us about. We use your explicit consent or our legitimate organisational interest as the legal basis for communications by post and email. You may opt-out of receiving these at any time using the contact details at the beginning of this policy.

Being a charity the CRGT relies on the support of a range of donors and supporters and when visiting the CRGT website you are given the opportunity to opt in to receiving information about the CRGT fundraising initiatives. We will contact you for these purposes only if the relevant box has been ticked. You can opt out or change your contact preferences at any time.

When visiting the CRGT website you may also be given the opportunity to opt in to receiving information from other organisations. The CRGT will only share your personal information with these organisations if the relevant box has been ticked. You can opt out or change your contact preferences at any time.

5.3 Email marketing – We may send you information about similar services and events which we feel may interest you, where you have consented to be contacted for such purposes or it is our legitimate

interest to do so. You are given the opportunity to opt out from any marketing communication on every subsequent marketing email you receive. You can also opt out or update your contact preferences at any time by using the contact details at the start of this policy.

5.4 Other processing activities – To comply with our obligations as a charity, we must take reasonable and appropriate steps to know who our donors are, in order to effectively manage relationships, particularly when significant sums are being donated. This means that we may conduct research, including accessing publicly available information on prospective donors or corporate partners, including individuals and organisations, to ensure that accepting support is in the best legitimate interest of the CRGT. This will help to give assurance that the donation is from an appropriate source and to safeguard our reputation. This does not mean that we will question every donation, nor that we will research lots of personal and other details about every donor. Any information we do collect for this purpose will only consist of what is necessary for us to meet these requirements and will be processed in line with your rights.

5.5 You should note that the public elements of the CRGT website will be visible by users of the site anywhere in the world. You should therefore be careful when submitting information about yourself and only submit information that you are happy to be public information.

5.6 We may disclose your personal information to (i) other carefully selected third parties to contact you about services and events which may be of interest to you, where you have consented to be contacted by third parties for such purposes; (ii) any third party to whom disclosure is necessary to enable us to provide you with any service to which you have subscribed via the CRGT website (including, but not limited to, for the purposes of designing, maintaining and administering the site) (iii) any person to whom disclosure is necessary to enable us to enforce our rights under this Privacy Policy or under the User Terms.

5.7 If we are required by law or requested by the police or a regulatory or government authority investigating potentially illegal activities to provide information concerning your activities whilst using the network we shall do so. We may also disclose personal information to appropriate third parties to assist in anti-fraud checks and investigations.

## **6. Cookies**

6.1 The CRGT website uses cookies to ensure that you get the most out of the site. A cookie is a text file sent by a web server to a web browser, and stored by the browser. The text file is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

6.2 Therefore, we may send a cookie which may be stored by your browser on your computer's hard drive. We may use the information we obtain from the cookie in the administration of the CRGT website, to improve the site's usability and for marketing purposes. We may also use that information to recognise your computer when you visit the site, to monitor website traffic and to personalise the site for you.

6.3 If you do not wish us to install cookies on your computer for these purposes, you may change the settings on your internet browser to reject cookies. For more information please consult the 'Help' section of your browser. Please note that if you do set your browser to reject cookies, you may not be able to use all of the features of our site.

6.4 As mentioned above, we may use an analytics service provider (such as Google Analytics) for website traffic analysis and reporting. Analytics service providers generate statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to the site may be used to create reports about the use of the site and the analytics service provider will store this information.

## **7. Third Party Sites and Contributors**

7.1 The Site may contain links to websites and microsites that are operated by third parties. We do not control those websites and microsites and as such this Privacy Policy does not apply to those websites and microsites. Please consult the terms and conditions and privacy policy of those third party websites and microsites to find out how they collect and use your personal data and to establish whether and for what purpose they use cookies.

7.2 Any advertisements contained on our Site may operate as links to that advertiser's website and as such any information they collect by virtue of you clicking on that link will be collected and used in accordance with the privacy policy of that advertiser.

## **8. Security and Data Retention**

8.1 We are committed to ensuring that your information is secure. In order to prevent your information from unauthorised access, disclosure and processing and from accidental loss, destruction and damage we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We will retain your information, including your name, address, email and phone number for the duration of your membership of the site (where available) and for a reasonable period or as long as the law requires or permits.

8.2 Only approved contractors/developers we may appoint from time to time, and who need the information to perform a specific job, are granted access to personally identifiable information.

8.3 Regular security reviews are held by us to ensure that the site remains safe and secure for your protection.

8.4 Data transmission over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

## **9. Surveys and Promotions**

From time to time we conduct surveys and promotions and may request information from you as part of these. Participation in these is entirely voluntary and you therefore have a choice whether or not to disclose any information which might be required. We'll do this on the basis of our legitimate business interest as this will help us make our services more relevant to you. We may also ask you whether you would like to receive promotional emails and mailings from us about other aspects of our services. Again, you are under no obligation to accept such information.

## **10. International Data Transfer**

10.1 Our servers are situated in the UK, however we collect data from wherever users are situated. The information that we collect may therefore be transferred to the UK from any other country in which you may be located and will be subject to the UK data protection laws.

10.2 Your personal data may be transferred, processed and/or stored outside the European Economic Area (EEA), for example if the supplier or service provider of our choice is based outside the EU. If we transfer your information outside of the EEA in this way, and the country in question has not been deemed by the EU Commission to have adequate data protection laws, we will provide appropriate safeguards and we will be responsible for ensuring your privacy rights continue to be protected as outlined in this notice. By submitting your personal data you agree to this transfer, storing or processing.

## **11. Data Retention- How Long We Will Keep Your Personal Data**

11.1 We will retain your information, including your name, address, email and phone number (where applicable), for the duration of your membership of the site (where applicable) and for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

11.2 To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

11.3 At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning and reporting.

Our retention periods may be extended or reduced if we deem it necessary, for example, to defend legal proceedings or if there is an on-going investigation relating to the information.

## **12. Your Rights**

12.1 Under certain circumstances, by law you have the right to:

- Access the information held about you (commonly known as a "data subject access request")
- Ask us to make any necessary changes to ensure that it is accurate and kept up to date.
- Ask us to erase your personal information from our files and systems where there is no good reason for us continuing to hold it.
- Object to us using your personal information to further our legitimate interests (or those of a third party) or where we are using your personal information for direct marketing purposes.
- Ask us to restrict or suspend the use of your personal information, for example, if you want us to establish its accuracy or our reasons for using it.
- Ask us to transfer your personal information to another person or organisation.

You also have rights in relation to automated decision making which has a legal effect or otherwise significantly affects you. We do not carry out any automated processing, including profiling, which produces significant legal effects concerning you.

If you wish to exercise any of these rights, please contact us (see paragraph 1. *Contacting Claygate Recreation Ground Trust*).

12.2 You may request us to cease sending you any marketing information at any time by notifying us in writing – please see paragraph 1. *Contacting Claygate Recreation Ground Trust*. However, if you withdraw your consent to certain types of processing we may be unable to fulfil our obligations to you.

12.3 If you are under 18, please ensure that you obtain your parent/guardian's consent beforehand whenever you provide personal information to the CRGT.

## **13. Updating Information**

If you would like to revise or update the personal information provided to us at any time, please email [secretary@crgt.co.uk](mailto:secretary@crgt.co.uk)

## **14. Queries and Complaints**

14.1 If you have any questions about this privacy notice or how we handle your personal information, please contact us (see paragraph 1. *Contacting Claygate Recreation Ground Trust*).

14.2 You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## **15. Changes To Our Privacy Policy**

We reserve the right to make changes to this Privacy Policy from time to time so please check it periodically. It was last updated on 27<sup>th</sup> May 2018.