



South Dorset Spurs – GDPR Privacy Notice

Responsible Officer	South Dorset Spurs Data Protection Officer
Issued	21 May 2018
Version	1
Next review date	December 2018
Approval required by	South Dorset Spurs Committee

Background

South Dorset Spurs (SDS) is an Official Supporters Club of Tottenham Hotspur Football Club and offers supporters a range of exclusive benefits enabling fans to get closer to Tottenham Hotspur.

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to data subjects (any person whose personal data is being collected, held or processed).

As SDS has members and therefore holds personal data, we have prepared this document to comply with GDPR.

Collecting personal details

SDS must process personal data (including sensitive personal data) so that it can provide these services – in doing so, the SDS acts as a data controller.

You may give your personal details to the SDS directly, such as on membership form, via our website or we may collect them from another source such as an events function. Therefore, SDS must have a legal basis for processing your personal data. For the purposes of providing you with match ticket services and/or information relating to events, we will only use your personal data in accordance with the terms of the following statement.

[1. Collection and use of personal data](#)

[a. Purpose of processing and legal basis](#)

SDS will collect your personal data (which may include sensitive personal data) and will process your personal data for the purposes of providing supporter events and services. This includes for example, contacting you about forthcoming meetings, match ticket availability and match travel arrangements, updating our database.

In some cases, we may be required to use your data for forwarding to Tottenham Hotspur Football Club to enable them to pass on match ticket information and other club related offers.

The legal bases we rely upon to offer these services to you are:

- Your consent
- Where we have a legitimate interest
- To comply with a legal obligation that we have
- To fulfil a contractual obligation that we have with Tottenham Hotspur Football Club.

E-mails only to be sent to under 16's if adult consent on membership form. SDS will therefore need to make reasonable efforts to verify that anyone giving their own consent is old enough to do so.

For children under 16 SDS will get consent from whoever holds parental responsibility for the child. We will make reasonable efforts (using available technology) to verify that the person giving consent does, in fact, hold parental responsibility for the child.

b. Legitimate interest

This is where SDS has a legitimate reason to process your data provided it is reasonable and does not go against what you would reasonably expect from us. Where SDS has relied on a legitimate interest to process your personal data our legitimate interests is/are as follows:

- Managing your database and keeping membership records up to date
- Passing your information to with Tottenham Hotspur Football Club.

c. Recipient/s of data

SDS may forward your personal data and/or sensitive personal data to following recipient:

- Tottenham Hotspur Football Club

d. Statutory/contractual requirement

Your personal data is required by a contractual requirement (e.g. Tottenham Hotspur Football Club may require this personal data). You are obliged to provide the personal data and if you do not the consequences of failure to provide the data are:

- We will not be able to allow you to be a member of SDS.

2. Data retention

SDS will retain your personal data only for as long as is necessary for the purpose we collect. This will generally be up to 4months after the end of the previous financial year – i.e. 30th September. This will allow us to keep in contact with you until you renew your yearly membership which commences annually on 1st June.

Where the Company has obtained your consent to process your personal and/or sensitive data, we will do so in line with our retention policy. Upon expiry of that period, SDS will seek further consent from you. Where consent is not granted, SDS will cease to process personal and/or sensitive data.

3. Your rights

Please be aware that you have the following data protection rights:

- The right to be informed about the personal data SDS processes on you
- The right of access to the personal data the Company processes on you;
- The right to rectification of your personal data
- The right to erasure of your personal data in certain circumstances
- The right to restrict processing of your personal data
- The right to data portability in certain circumstances (allows you to obtain and reuse your personal data for your own purposes).
- The right to object to the processing of your personal data that was based on a public or legitimate interest;
- The right not to be subjected to automated decision making and profiling
- The right to withdraw consent at any time.

Where you have consented to SDS processing your personal and/or sensitive data you have the right to withdraw that consent at any time by contacting SDS.

There may be circumstances where SDS will still need to process your data for legal or official reasons. We will inform you if this is the case. Where this is the case, we will restrict the data to only what is necessary for the purpose of meeting those specific reasons.

If you believe that any of your data that SDS processes is incorrect or incomplete, please contact us at southdorsetspurs@hotmail.co.uk and we will take reasonable steps to check its accuracy and correct it where necessary.

You can also contact us using the above details if you want us to restrict the type or amount of data we process for you, access your personal data or exercise any of the other rights listed above.

Under GDPR, individuals have the right to obtain;

- confirmation that you are processing their data
- access to their personal data; and
- other supplementary information – this largely corresponds to the information that you in provided in in this privacy notice.

Individuals can request information verbally or in writing. SDS will provide a copy of the information free of charge. However, SDS can charge a 'reasonable fee' when a request is:

- manifestly unfounded or excessive, particularly if it is repetitive, unless you refuse to respond; or
- for further copies of the same information (that's previously been provided).

This does not mean that you can charge for all subsequent access requests.

SDS will base the fee on the administrative cost of providing the information.

SDS will provide information without delay and at least within one calendar month of receiving it. SDS can extend this by a further two months for complex or numerous requests (in which case SDS will inform the individual and give an explanation).

SDS will calculate the time limit from the day after we receive the request (whether the day after is a working day or not) until the corresponding calendar date in the next month. A calendar month ends on the corresponding date of the next month (e.g. 2 January to 2 February), unless that date does not exist in which case it is the last day of the next month (e.g. 31 January to 28 February).

If the corresponding date falls on a weekend or a public holiday, SDS will have until the next working day to respond (e.g. you receive a request on 30 March and the time limit starts from the next day (31 March). As there is no equivalent date in April, we have until 30 April to respond. However, if 30 April falls on a weekend, or is a public holiday, we have until the end of the next working day to respond).

This means that the legal deadline will vary from 28 days to 31 days depending on the month. SDS will verify the identity of the person making the request, using "reasonable means".

If the request is made electronically, SDS should provide the information in a commonly used electronic format.

[4. Right to rectification and data quality](#)

Individuals have the right to have personal data rectified if it is inaccurate or completed if it is incomplete.

An individual can make a request for rectification verbally or in writing.

SDS should respond to a request without delay and at least within one month of receipt. We should calculate the time limit from the day after you receive the request (whether the day after is a working day or not) until the corresponding calendar date in the next month.

A calendar month ends on the corresponding date of the next month (e.g. 2 January to 2 February), unless that date does not exist in which case it is the last day of the next month (e.g. 31 January to 28 February).

If the corresponding date falls on a weekend or a public holiday, SDS will have until the next working day to respond (e.g. SDS receive a request on 30 March and the time limit starts from the next day (31 March). As there is no equivalent date in April, we have until 30 April to respond. However, if 30 April falls on a weekend, or is a public holiday, we will have until the end of the next working day to respond).

This means that the legal deadline will vary from 28 days to 31 days depending on the month. For practical purposes if a consistent number of days is required (e.g. for a computer system), SDS will adopt a 28-day period to ensure compliance is always within a calendar month.

SDS can extend this period by a further two months for complex or numerous requests (in which case SDS must inform the individual and explain the delay). It is good practice to make a note on the record showing that it is under dispute and why.

SDS must verify the identity of the person making the request, using “reasonable means”. If we have shared the personal data with other organisations (for example other controllers or processors) we must inform them of the rectification where possible.

SDS should regularly review the information you process or store to identify when we need to take action, e.g. correct inaccurate records. Records management policies, with rules for creating and keeping records (including emails) can help.

SDS will conduct regular data quality reviews of systems and manual records you hold. This will help to ensure the information continues to be adequate for the purposes we are processing for.

SDS will also ensure that we complete regular data quality checks to provide assurances on the accuracy of the data being inputted by us.

If SDS identify any data accuracy issues, we will communicate lessons learned to our committee through ongoing awareness campaigns and internal training.

[5. Complaints or queries](#)

If you wish to complain about this privacy notice or any of the procedures set out in it please contact:

The SDS Data Protection Officer – at southdorsetspurs@hotmail.co.uk

You also have the right to raise concerns with Information Commissioner’s Office on 0303 123 1113

or at <https://ico.org.uk/concerns/> or any other relevant supervisory authority should your personal data be processed outside of the UK, if you believe that your data protection rights have not been adhered to.