DATA PROTECTION POLICY

Co-ordinators and Responsible Persons: Joe Reeves/Daniel Dawkins

1. Data protection principles
Dynamic Sports Coaching is committed to processing data in accordance with its responsibilities under the General Data Protection Regulations (GDPR).

Article 5 of the GDPR requires that personal data shall be:
- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; ensuring every reasonable step will be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed is erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. General provisions
This policy applies to all personal data processed by Dynamic Sports Coaching. The Responsible Persons shall take responsibility for Dynamic Sports Coaching’s ongoing compliance with this policy. This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing
The personal data Dynamic Sports Coaching will obtain will be participant details for a register of attendees/fire list and emergency contact information from parents/carers by consent. As such this data will only be held for the duration of any respective multi sports event and subsequently securely destroyed via permanent deletion (irrecoverable) in electronic format and shredded if in paper format. Dynamic Sports Coaching may request via consent to use images and names of event attendees for their own marketing purposes. Dynamic Sports Coaching may request via consent parent or carer contact details to be retained and used to inform them of future events. Dynamic Sports Coaching will not share and details or images with any third party. Individuals have the right to access their personal data and any such requests made to Dynamic Sports Coaching shall be dealt with in a timely manner.

4. Lawful purposes
All data processed by Dynamic Sports Coaching will be done on the lawful basis of consent. (see ICO guidance for more information). As consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data. Where communications are sent to individuals based on their consent, the option for the individual to revoke said consent will be acted upon immediately by Dynamic Sports Coaching.
5. **Data minimisation**
Dynamic Sports Coaching shall ensure that personal data is always adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

6. **Accuracy**
Dynamic Sports Coaching shall take reasonable steps to ensure personal data is accurate.

7. **Archiving / removal**
Personal data is kept for no longer than necessary, Dynamic Sports Coaching have in place a system in which personal data is destroyed at the conclusion of the respective multi sports activity session(s). This is with the exception of parent or carer contact details, images and/or participants names used solely for Dynamic Sports Coaching consented marketing which will be retained for one year from the date of the event or longer by consented agreement.

8. **Security**
Dynamic Sports Coaching shall ensure that personal data is stored securely using modern software that is kept up-to-date. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information. When personal data is deleted it will be done safely such that the data is irrecoverable. Appropriate back-up and disaster recovery solutions shall be in place.

9. **Breach**
In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data, Dynamic Sports Coaching shall promptly assess the risk to people’s rights and freedoms and if appropriate report this breach to the ICO [more information on the ICO website](https://ico.org.uk/).