

# Data Protection Policy

## GDPR compliance statement



Approved by:	Tom Humphreys		
Last Reviewed on:	25/6/2025		
Next Review Due:	25/6/2026		

### Primary Sports Giants – GDPR Statement

As a sports coaching company that provides curriculum PE to children in schools and a holiday childcare service for parents, amongst other services, we regularly have to collect and use information about people with whom we work. We ensure that this personal information is handled and dealt with properly, however it is collected, recorded and used, and whether it be on paper, in computer records or recorded by any other means.

We regard the lawful and correct treatment of personal information as very important to our successful operation and to maintaining confidence between us and those with whom we carry out business. We will ensure that we treat personal information lawfully and correctly.

Primary Sports Giants is committed to ensuring all of our systems are secure and the data we have is protected by adhering to the following processes:

- training of all staff (including management) on GDPR requirements and cybersecurity;
- use of encryption software when sending secure personal data;
- use of specific anti-malware and anti-virus software;
- use of encryption and remote deletion software on laptops, tablets and mobile phones used by

staff members that may contain personal data.

- by ensuring that all suppliers and subcontractors we use have signed a confidentiality notice that is GDPR compliant.

To this end we fully endorse and adhere to the principles of the General Data Protection Regulation (GDPR).

## Primary Sports Giants – Data Protection and GDPR Policy

### 1. Introduction

Primary Sports Giants ("the Company") is committed to protecting the rights of individuals in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. This policy outlines our approach to collecting, processing, storing, and sharing personal data.

### 2. Scope

This policy applies to all personal data processed in the context of:

- School-based sports delivery
- Holiday activity and food (HAF) camps
- Direct-paid sports and activity programmes
- Private hire events and birthday parties

### 3. Data Controller and Contact

The Company is the data controller. Our appointed data protection lead is:

*Data Protection Lead*

Primary Sports Giants

Tom Humphreys

1Springfield Cottages

Canterbury

CT45DX

### 4. Legal Basis for Processing

We rely on the following legal bases:

- Consent – for optional processing like marketing or photos
- Contract – to deliver our services (including paid events)
- Legal obligation – compliance with health & safety, safeguarding, etc.
- Legitimate interest – for business administration and service development
- Public task – e.g., delivery of public-funded programmes such as (HAF)

## 5. Categories of Data Collected

- Personal identifiers: name, address, contact details
- Child data: name, age, medical & SEND needs, school information, emergency contact details, home address
- Financial: payment details, voucher use
- Event-specific preferences (e.g., party themes)
- Digital data via Google Workspace and OnSideLive booking system: emails, attendance logs, forms

## 6. Use of Google Workspace

We use Google Workspace (e.g., Gmail, Drive, Forms) as a data processor.

- Google acts under our instructions and is bound by a Data Processing Agreement (DPA).
- Google's data centres may process data within the EU or in countries deemed adequate under GDPR.
- We ensure appropriate security and access controls are in place, including Two Factor Authentication (2FA) and data encryption.

Google's compliance with GDPR is detailed in their Data Processing Addendum:  
[https://workspace.google.com/terms/dpa\\_terms.html](https://workspace.google.com/terms/dpa_terms.html)

## 7. Special Category Data

We may process health-related information for children attending our events. This is done under Article 9(2)(a) or (c) of the GDPR, with explicit consent or to protect vital interests.

## 8. Principles of Data Processing

We adhere to the GDPR principles:

- Lawfulness, fairness, transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality
- Accountability

## 9. Data Subject Rights

Individuals have rights to:

- Access
- Rectification
- Erasure
- Restriction
- Objection
- Portability
- Withdraw consent
- Lodge a complaint (e.g., with the Information Commissioner's Office ICO)

## 10. Data Sharing

Personal data may be shared with:

- Local authorities (e.g., for HAF verification)
- IT and event service providers (under contracts with appropriate safeguards)
- Emergency services if necessary

## 11. Security Measures

- Encrypted and password-protected files
- Role-based access to Google Workspace
- Staff training in data handling
- Regular reviews of data protection practices

## 12. Photographs and videos

As part of Primary Sports Giants's activities, we may take photographs and record images of individuals taking part in our activities.

We will obtain consent from parents/carers for photographs and videos to be taken of their child for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and child.

Uses may include:

- In our brochures
- Online on our website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with any other full personal information about the child, to ensure they cannot be identified.

**See our photography policy for more information on our use of photographs and videos.**

### 13. Retention

- Booking and attendance: 6 years
- Financial: 7 years (per HMRC guidance)
- Medical/safeguarding: as per legal requirements

### 14. Breach Notification

We will report breaches to the ICO within 72 hours if they pose a risk to individuals and will inform affected data subjects where required.

### 15. Review

This policy is reviewed annually and whenever there are material changes in processing activities or regulations.