



# LEICESTER TIGERS *Foundation*

## Data Protection Policy

### 1. INTRODUCTION

The Leicester Tigers Foundation is committed to preserving the privacy of its staff and students and complying with the Data Protection Act (2018) and the General Data Protection Regulation (GDPR). The data protection principles set out in the Data Protection Act (2018) and Article 5 of the GDPR are:

- Processed lawfully, fairly, and transparently.
- Collected for specified, explicit, and legitimate purposes.
- Adequate, relevant, and limited to what is necessary.
- Accurate and kept up-to-date.
- Kept in a form that permits identification of data subjects only as long as necessary.
- Processed securely against unauthorized access and accidental loss.

Concerns should be discussed with Ross Elder, Data Protection Lead.

### 2. PURPOSE

The Foundation processes personal data for various purposes, including fulfilling contractual obligations, managing staff and student records, safeguarding, and promoting services. This also includes the use of CCTV for security and crime prevention.

### 3. DEFINITIONS

Personal data refers to information relating to an individual who can be identified from that data. This includes sensitive data about an individual's gender, age, ethnicity, etc. Processing includes obtaining, storing, using, and disposing of data. The Foundation is committed to responsible and secure processing of personal data.

### 4. POLICY STATEMENT

This policy outlines responsibilities for handling and processing data. All staff, including third parties and volunteers, must comply with this policy and related data handling policies.

### 5. IMPLEMENTATION

To ensure compliance:

- Conduct Data Privacy Impact Assessments for new projects.
- Limit access controls to role relevance.
- Collect data lawfully and explain its use.



# LEICESTER TIGERS

## Foundation

- Obtain explicit consent where required.
- Ensure data accuracy and relevance.
- Review retention periods and ensure safe disposal.
- Provide training on data handling.
- Manage data sharing in line with legislation and agreements.
- Safeguard data transfers outside the EU/EEA.

## 6. TRAINING

Training includes:

- Mandatory induction training.
- Annual online testing.
- In-house risk assessments and audits.

## 7. FOUNDATION POLICIES AND LEGISLATIVE CONNECTIONS

Relevant policies include Social Media, Disciplinary, Equality and Diversity, and Safeguarding. The Foundation adheres to various legislative requirements related to data protection and electronic communications.

## 8. DATA SECURITY

Data security measures include:

- Using lockable cupboards and password protection.
- Regular password renewal.
- Secure storage and disposal of data.
- Safeguarding data transfers and access.

## 9. DATA SUBJECT RIGHTS / SUBJECT ACCESS REQUESTS

Individuals have the right to access their data, with requests handled within one month. Required identification includes full name, date of birth, and proof of identity. Requests will be responded to in a clear and accessible format.

## 10. DATA SHARING

Data may be shared with consent or where exemptions apply, including legal obligations, HM Revenue and Customs, law enforcement, and other relevant bodies. The Foundation will ensure compliance with data sharing agreements and legal requirements.

## 11. RETENTION AND DISPOSAL OF DATA



# LEICESTER TIGERS

## Foundation

Data will be retained as necessary for legal and business needs, including pensions, taxation, and student records. Disposal will follow secure practices, using ISO-accredited companies for certification.

### **12. DATA SECURITY BREACH PROCEDURE**

In the event of a breach:

- Contain and recover from the breach immediately.
- Assess risks and potential impacts on individuals.
- Notify affected data subjects, the ICO, and other relevant parties as necessary.

**Policy reviewed in Sep 24. Next review Sep 25**