

CITY IN THE COMMUNITY

CITY IN THE COMMUNITY GDPR PRIVACY POLICY

Information for schools, community organisations, participants and people who we work with

This notice applies to the collection and use of personal data in relation to City in the Community's community projects. The information provided is focused on participants in such events, but also explains the other categories of person whose personal data we may collect and use. It has been updated to take account of the European General Data Protection Regulation which has been implemented into the UK by the Data Protection Act 2018.

<p>Who is the Data Controller?</p>	<p>Manchester City F.C. City in the Community Foundation is a company registered in England and Wales with registration number 07447531 and registered office at Etihad Stadium, Etihad Campus, Manchester M11 3FF ("CITC", "we", "us", "our").</p> <p>We are registered with the Information Commissioner's Office with registration number ZA121027. Our Data Protection team can be reached via the enquiry email address at CITCGDPR@cityfootball.com or call 0161 438 7864 or write to CITC GDPR, Etihad Stadium, Etihad Campus, M11 3FF</p>
<p>What information about you do we use?</p>	<p>In the course of our activities, we may collect information about (i) people who participate in our events and projects (including children and adults with disabilities); (ii) parents and guardians of participants (where applicable); (iii) people we work with to coordinate our events and projects (such as teachers, community group leaders, education staff and others); and (iv) people who volunteer or provide support at our events.</p> <p>In relation to participants, we may collect::</p> <ul style="list-style-type: none"> • full name; • contact information (including postal address, telephone number and email address); • emergency contact details; • where a child under 16 parent or guardian details; • address/postcode; • gender; • date of birth; and • details about performance and participation in our events. <p>We may also take photographs or video of our events to help promote our causes and to provide to participants. We will always inform participants when this is the case.</p> <p>In relation to other categories of person the types of personal information that we collect may vary, but will usually include name, contact information and may also (depending on the circumstances) include qualifications, experience etc.</p> <p>Because of the nature of the work that we do and also to enable us to monitor equality and diversity we may sometimes ask for special category data to be provided, such as information about health, disability, religious beliefs or similar matters. Further information about this is provided below.</p>
<p>Why do we use your information?</p>	<p>To deliver, monitor, evaluate and improve projects we run and report to organisations that provide funding for the projects on how many people we work with, how often they use our projects, which local areas or community groups they come from, and how they benefit from taking part. We also track attendance and progress of participants through projects. We also use it for the purpose of managing risks associated with events (such as health and safety) and diversity and equality monitoring.</p> <p>We may use personal information for the purposes of delivering grants or specific funding to individuals or projects.</p> <p>We may use information to communicate directly with participants about our events or activities (for example, if there has been a postponement due to bad weather or a change of location). We may use photographs and videos of our activities in promotional work and case studies.</p>
<p>How do we collect information about you?</p>	<p>We may collect personal information directly from participants (or their parents or guardians) and attendees when they sign up to attend a CITC course or session. We may also collect personal information about participants and attendees through the schools, colleges and community organisations that we work with when the participant will be attending a course or session that has been run in conjunction with that particular organisation. We may collect other personal information from people who work with us at the point we engage with them.</p>

<p>What is the legal basis for this use?</p>	<p>In most cases our use of personal information is necessary and is based on the following legal grounds:</p> <ul style="list-style-type: none"> • for the performance of a contract with data subjects (including delivering our services and events to schools and community organisations); and • our legitimate interests (in monitoring the uptake, performance and attendance at our projects and events and ensuring the safe and appropriate delivery of the same as well as managing our risks). <p>We may also occasionally use personal information:</p> <ul style="list-style-type: none"> • where we are required to by law or under a legal obligation (for example, in respect of our financial records or health and safety law); and • where we have been provided with explicit consent from the data subject (or on their behalf in respect of minors) (for example, to receive direct marketing about our events or projects). <p>Where the legal basis for our use of personal information is consent the individual can withdraw their consent at any time (this will not affect any use of their information which has already occurred).</p> <p>Where individuals fail to provide certain information we request or require, we may not be able to provide our services, adapt them for that particular person's needs or, where applicable, perform a contract with them</p>
<p>When can we use or record sensitive information about you?</p>	<p>We may collect the following information about participants which falls within special categories of particularly sensitive personal information:</p> <ul style="list-style-type: none"> • medical or health conditions; • disability status; • ethnicity; • gender at birth; • sexual orientation; and • religion or beliefs. <p>We collect this information to ensure that our sessions are suitable for all attendees, and to monitor, evaluate and improve the projects we run. We also report to organisations that fund the projects on rates of diversity and inclusion.</p>
<p>What is the legal basis for the use of sensitive information about you?</p>	<p>In relation to sensitive information, we will only ever record and use this on one of the following legal bases:</p> <ul style="list-style-type: none"> • where it is necessary for reasons of substantial public interest (for example in relation to monitoring the equal opportunity and equal treatment of our projects and the distribution of our funding) provided that the processing is proportionate and there are appropriate safeguards in place; and • where we have been provided with explicit consent from the data subject (or on their behalf in respect of minors). <p>Our appropriate safeguards include internal policies, procedures and training in relation to the protection of sensitive information. We also keep records of our use of this information and have retention and archiving procedures in place (see below).</p>
<p>Can we change the purposes we process your information for?</p>	<p>We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information for an unrelated purpose, we will notify data subjects and we will explain the legal basis which allows us to do so.</p> <p>Please note that we may process personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.</p>
<p>Who may we share your information with?</p>	<p>We may share personal information with:</p> <ul style="list-style-type: none"> • Manchester City Football Club for the purposes of delivering projects using club facilities or resources, as well as delivering co-branded initiatives; • the Premier League Charitable Foundation for the purposes of demonstrating and reporting the impact and reach of charitable funding applied to CITC (although where data is shared with this body it is anonymised and is high-level statistics only – for more information please contact us); • Substance 2005 Limited as the hosts and administrators of the "Views" database used to store and analyse data regarding participants – Substance is a data processor acting on behalf of the Premier League Charitable Foundation and providing services to CITC; • third party service providers who help us to deliver our projects and sessions; • the schools and community organisations we work with (for example in relation to the

	<ul style="list-style-type: none"> performance of our projects or attendance or development of individual participants); where necessary with our legal and similar professional advisors; and to the extent we are required to by law or a legal / regulatory body.
<p>Where is your information stored? Where can it be transferred?</p>	<p>The information we collect and hold will be held on our secure servers within the European Economic Area (the EEA) and will not be transferred outside of the EEA.</p> <p>Information we record and store using the Views system operated by Substance is hosted live using Rackspace, a UK based virtual hosting company. Rackspace UK is located in Hayes, Middlesex. The company's centres are accredited to ISO27001 standards.</p>
<p>How long will your information be kept on file?</p>	<p>We keep personal information for as long as a person is taking part in one of our projects, and for a limited time afterwards, in case a participant decides to return to a CITC project, or to take part in other projects we run.</p> <p>If you are a participant and it is more than one year since we last saw you, we will archive your personal information. This means that we file it away in our database in case you come back to CITC.</p> <p>After your personal information has been archived, if it is more than three years since we have last seen you, we will anonymise your personal information. This means that we no longer know who it belongs to, but we are still able to report on how many people we have worked with in previous years, and high-level data for our reporting and statistical analysis (such as the age range of participants). The reason that we wait three years before anonymising it is that our funding runs in three year cycles and we need to ensure we report accurately to our funders on participation levels.</p> <p>If you provide services to us or we work with you under a contract, we may keep your information for up to six years after the end of our contract, to help manage our legal risk.</p>
<p>Your rights</p>	<p>Right of access Individuals have a right to access the personal information we hold about them.</p> <p>Right of rectification Individuals can ask us to correct or update information we hold about them to ensure it is accurate and complete.</p> <p>Right to erasure and right to restrict processing Individuals can ask us to stop processing and to delete their data in certain circumstances (for example where it is processed on the basis of consent, or it is no longer necessary for us to process it).</p> <p>Right to data portability Individuals have a right to ask us to provide them with information in a form that suits them, and/or to provide their information to a third party.</p> <p>Right to object Individuals have a right to object to our processing of their information.</p> <p>Individuals can exercise the above rights by contacting us. Further information about the legal rights that individuals have is also available from the ICO's website (www.ico.org.uk).</p>
<p>Automated decision making</p>	<p>We do not use automated decision-making and profiling techniques to take decisions which affect individuals. We do use automated aspects of the Views system to produce statistical reports regarding the categories of people that are utilising our services. However, this data is anonymised and does not produce legal effects concerning the data subjects or similarly significant effects.</p>
<p>Contact and complaints</p>	<p>If you have question, want to exercise your rights or make a complaint, please contact us at : CITCGDPR@cityfootball.com or via 0161 438 7864 or write to CITC GDPR, Etihad Stadium, Etihad Campus, M11 3FF</p> <p>You can also make a complaint to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF, telephone 0303 123 1113. www.ico.org.uk.</p>
<p>Updates</p>	<p>This policy may be updated from time to time and you may be notified by email where appropriate.</p>