



County Community Trust

Privacy Notice

Introduction

CCT operate for the benefit of the local residents of Stockport and the wider community. We form partnerships between community groups that are making a difference and the people who wish to invest in a better future for the local area.

We take our duty to process your personal data very seriously and endeavour to follow the Data Protection principles of “lawfulness, fairness and transparency” at all times. This policy explains how we collect, manage, use and protect any information we collect about you to ensure you remain informed and in control of your information.

In this policy references to County Community Trust or CCT ‘we’ and ‘us’ relates to the official affiliated community trust at Stockport County Football Club.

County Community Trust is the name we use in all our community and fundraising activities, as a trading name of the registered company The Hatters Project Limited.

We may change this document from time to time to reflect the latest regulations on what we should lawfully do with your information. Please check back frequently to ensure that you are happy with any changes.

What information we collect

County Community Trust is what is known as the ‘controller’ of the personal data you provide to us. We will usually collect basic personal data about you like your name, postal address, telephone number, email address if you are supporting us or participating in one of our community activities.

Activities and involvement with CCT will result in personal data being created. This could include details of how you have helped us by volunteering or being involved with our campaigns or events.

We do not normally collect or store sensitive data (such as information relating to health, beliefs, or political affiliation) about participants. However, there are some situations where this will occur including, but not exclusively, if:

- An accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers).
- If you are attending one of our events and have disclosed specific access or dietary needs.
- If this does occur, we will be very clear with you that we wished to collect such information, our reason for collecting such information, and that we would only do so with your knowledge and consent. We will also take extra care to ensure your privacy rights are protected. In respect of



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personal data regarding children, it may be more appropriate instead to seek the consent of the parent or guardian in order to comply with this promise.

How we collect your information

We collect information about you when you enquire about using any of our services, as part of us providing you with our services, when participating in any event or activity we have arranged, when you register an interest in supporting the County Community Trust or make any financial or non-financial donation to Us.

We collect your personal information in a number of ways:

- When you provide it to us directly. Your activities and involvement with County Community Trust will result in personal data being created. This could include details of how you have helped us by being involved with our campaigns and activities.
- When you provide permission to other organisations to share it with us (for example via Facebook or Twitter).
- When you have given it to a third party. For example, if we are partnering with another organisation (e.g., you provide your information to another charity or organisation that we are collaborating with).
- From publicly available sources to keep your information up to date (e.g., from Companies House, news, or other media).

How we use your information

- We will only use your information for the purpose or purposes for which it was collected for (or for closely related purposes). These purposes include:
- Where the information is needed to fulfil your request or to enable us to provide you with a more personalised service. Sometimes, with your consent, we will process your personal data to provide you with information that you have requested about our work or our activities, or that you are expecting.
- We use personal data for administrative purposes (i.e., to carry on our charity work). This can include receiving donations, processing, and maintaining a database of supporters and friends, arranging and hosting community events and activities, and helping us respect your choices and preferences (e.g., if you ask not to receive marketing material, we will keep a record of this).
- Where we need to do this to fulfil a contract, or where we are required to do this by law or other regulations.
- When it is in our legitimate interests to do this and when these interests do not override your rights.
- We evaluate, categorise and profile personal data in order to tailor materials, services and communications, and prevent unwanted material from filling up your inbox.



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Marketing and Communications

We use personal data to communicate with people, to promote County Community Trust to help with fundraising and to make you aware of any upcoming events and activities you may be interested in. This includes keeping you up to date with our news, updates, campaigns and fundraising information. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about CCT and its work within the community).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, contact us by emailing countycommunitytrust@stockportcounty.com, or writing to: Stockport County Community Trust, Hardcastle Road, Edgeley, Stockport, SK3 9DD, or telephoning 0161-266-27000 (Lines open 9am – 5pm, Mon – Fri).

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect your communication preferences.

We run events for our supporters or for those whom we believe would be interested in the work of the CCT. We collect information about how you respond to or interact with our invitations, and this may affect your event processes.

As a registered charity, we rely on donations and support from others to continue our work. From time to time, we will contact members and supporters with fundraising material and communications. As with other marketing communications, we will only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).

Sharing your information

We only disclose information to third parties or individuals when we are obliged to by law, for purposes of national security, taxation and criminal investigations, and under the following circumstances:

- If you have agreed that we may do so.
- When providing an activity in conjunction with or under the terms of an appointment by another organisation which you are part of, for example a school, sports club or other similar association.
- When we use other companies to provide services on our behalf e.g., sending mail and emails, when using auditors/advisors, or processing credit/debit card payments.
- If we receive a complaint about any content, you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions, or if we believe that we need to do so to protect and defend the rights, property, or personal safety of CCT our websites or our visitors and for other lawful purposes.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity.
- In the event of a health and safety incident at one of our community events or activities.
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your data when you register.
- We will never sell or rent your personal information to other organisations.



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Where we collect personal data in connection with an activity arranged with school children, we have an obligation to report on those activities to Premier League Charitable Fund using the Substance impact reporting system ('known as 'Views'). This is the system used by the league to track participating children's progress in those activities. In sharing personal data with the provider of the Views system, We remain the data controller and the provider is a processor of that personal data.

When sharing personal data with any processor partner, we will ensure an agreement is in place to compel that processor to also comply with their own obligations in respect of the GDPR.

Research and Profiling

We evaluate personal data in order to tailor materials, services and communications and prevent unwanted material from filling up your inbox. Understanding our supporters and programme participants, their interests and what they care about also helps us provide you with a better experience.

Research can help us target our resources more effectively through gaining an insight into the background of our potential supporters and help build relationships that are appropriate to their interests and capacity to give. This increase in efficiency helps us ensure we are maximizing the good we can do within the district. To do this we may use additional external sources of data to increase and enhance the information we hold about you. This may include obtaining details of changes of address, telephone numbers and other contact details, and information related to your wealth. It may also include information from public registers and other publicly available sources.

We may collect and process personal data around the ethnic origin, health (including disability), sexual orientation and religious beliefs of participants in our activities for the purpose of monitoring equality of opportunity, provided that doing so is proportionate to the rights and freedoms of those participants and data subjects.

Data Retention

We hold your information only as long as necessary for each purpose we use it, and take reasonable steps to ensure that we only retain personal data that is relevant, accurate and not excessive. We regularly review what information we hold and delete what is no longer required. For successful grant applications, we may retain your data for up to 7 years, in line with financial best practice for our accounting purposes. We may retain some details of participants in our programmes securely in an archive for up to 6 years in case of the need to respond to a complaint against us.

If you decide not to support the CTT any longer, or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information. See also the section titled 'Your Rights' below.

Data Security

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of, your personal information.



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Electronic data and databases are stored on secure computer systems, and we control who has access to information (using both physical and electronic means). Our staff receive data protection training, and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Our electronic data is stored within secure cloud servers. Paper copies of any personal data that are stored in secure locked cabinets.

Payment Security

CCT specific – if you wish to make donations to the CCT, we will never request your bank details directly. BACS payments can be made directly to our business bank account (details of which are available upon request).

We cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and CCT. CCTV will only be viewed when necessary (e.g., to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review, CCTV will be recorded over.

Stockport County FC complies with the Information Commissioner's Office CCTV Code of Practice, and notices will be displayed so you know when CCTV is in use.

Your rights

We want to ensure you remain in control of your personal data. The General Data Protection Regulations (GDPR), give everyone a number of very important rights. These include:

- The right to ask us to remove your personal data from our records (though this will not apply where it is necessary for us to continue to use the data for a lawful reason).
- The right to have inaccurate data rectified.
- The right to request a copy of the information we hold about you.
- The right to ask us to stop using your information for marketing or profiling, and
- where technically feasible, the right to obtain and reuse your personal data for your own purposes.

You can change the way you hear from us or withdraw your permission for us to process your personal data at any time by using the contact details provided.



County Community Trust

Cookies and website

We use traffic log cookies to identify which pages of our website are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from our system.

Legitimate interest

Under the GDPR, we have a number of lawful reasons that we can use (or 'process') your personal information. One of these lawful reasons is where we consider there to be a 'legitimate interest' in doing so.

Broadly speaking, a 'legitimate interest' means that we can process your personal information if we have a genuine and legitimate reason, for example to provide you with useful and relevant information about activities you have or may participate in, and by doing so we are not harming any of your rights and interests.

Some typical examples of when we might use this approach are for:

- Preventing fraud.
- Direct marketing, where we believe you may be interested based on Our previous interactions with you.
- Maintaining the security of our system.
- Data analytics.
- Enhancing, modifying, or improving our services.
- Identifying usage trends.
- Determining the effectiveness of our campaigns and fundraising.

CCT will use various ways to achieve our mission and to support our objectives; we believe that people who share our values would love to know how to support us.

We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service, and products and provide the best and most safe and secure experience. These are what we consider to be both our and your 'legitimate interests' for Us holding and processing your data.

When we process your personal information for our 'legitimate interests', we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent.

You can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting us.



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Changes to the policy

CCT will amend this policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our policy will always be posted on our website.

Making a complaint or giving positive feedback

If you are dissatisfied with our organisation or our work and would like to raise a concern or make a complaint, or if you would like to leave some positive feedback about any aspect of our work, please get in touch with us.

County Community Trust is a separate organisation to Stockport County Football Club. If you want to find out more about the football club's data protection, [their full privacy policy can be found here](#)

How to contact us

If you have any questions about the policy or how we use your data, please get in touch using the details below.

Email: communitytrust@stockportcounty.com

Phone: 0161-266-2700

Stockport County Community Trust
Edgeley Park
Stockport
SK3 9DD

This notice was last updated: 14 July 2021