



LINCOLN CITY SUPPORTERS' SOCIETY LIMITED Data Protection Policy

1) **Definitions****Introduction**

This document was adopted pursuant to a resolution of Lincoln City Supporters' Society Limited ("the Society") at a Board Meeting held on 18th December 2024 in accordance with the Society Rules and will be submitted for ratification by the Society at its next Annual General Meeting.

The purpose of this Data Protection Policy is to confirm the policies with which the Society will comply, to ensure that it:-

- (a) protects everyone's rights and privacy; and
- (b) complies with the law

when collecting, storing, using, amending, sharing, transferring, destroying or deleting "personal data", which is information (including photographs, images and audio recordings) about a person which is identifiable as being about them, whether it can be stored electronically or on paper, and includes images and audio recordings as well as written information. Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing,

~~destroying or deleting personal data.~~ The overall focus is on embedding at the heart of the Society a culture of respecting and taking care of people's personal information and of only keeping information that is absolutely necessary.

2) Responsibility

Overall and final responsibility for data protection lies with the **Society's** Board of Directors ("**the Board**"), ~~who are~~**which is** responsible for overseeing activities and ensuring that this Policy is upheld.

All **the Board's** members **and all the Society's Officers** are responsible for observing this Policy and related procedures in all areas of their work for the ~~group~~**Society**.

No individual will be described as the Society's Data Protection Officer, because that title has a specific legal meaning which is not appropriate to organisations such as the Society.

3) Overall Policy Statement

- a. ~~Red Imps Community Trust~~**The Society** needs to keep personal data about its members **and third parties** in order to carry out ~~group~~**its** activities.
- b. ~~We~~**The Society** will collect, store, use, amend, share, **transfer**, destroy or delete personal data only in ways which protect people's privacy and comply with the **Data Protection Act 2018, the UK General Data Protection Regulation (GDPR)** and other relevant legislation.
- c. ~~We~~**The Society** will only collect, store and use the minimum amount of data that ~~we~~**it** needs for clear **specific** purposes and will not collect, store or use data that ~~we~~**it** does not need **or no longer needs**.
- d. The Society will only collect, store and use data:-
 - i. to perform a contract with the individual whose data it is; or
 - ii. for purposes that are in the Society's legitimate interests; or
 - iii. for purposes for which the individual has given explicit consent; or
 - iv. to comply with legal obligations.
- e. The Society will not collect, store and use data:-
 - i. for performing public tasks; or
 - ii. that is essential to protect someone's life.
- f. ~~We~~**The Society** will keep clear records of the purposes ~~of~~**for** collecting, storing **and holding** using specific data, ~~to~~ **and ensure it is only used only for these** those purposes.
- g. The Society will ensure that people know how to contact it if they want to exercise their rights to access, rectify, erase or transfer their data from its records or to object to or restrict its processing.

- h. ~~We will provide individuals with details of the data we have about them when requested by the relevant individual. We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.~~ **The Society will promptly take the action that it is required to take whenever individuals exercise their rights to access, rectify, erase or transfer their data from its records or to object to or restrict its processing.**
- i. ~~We~~ **The Society** will endeavour to keep personal data up-to-date and accurate, in line with its value to (and potential impact on) both the individual and the Society.
- j. ~~We~~ **The Society** will store personal data securely.
- k. **When the Society uses the personal data of anyone who is under 18 years of age, it will take appropriate action to safeguard both the child concerned and whoever uses the data on its behalf.**
- l. ~~We~~ **The Society** will not share personal data with third parties without the explicit consent of the relevant individual, unless (i) **it is necessary for the performance of a contract between the Society and the individual whose data it is or** (ii) **for purposes that are in the Society's legitimate interests or** (iii) **legally required to do so.**
- m. **The Society may use the services of reliable and reputable organisations based outside the United Kingdom, provided that they are subject to data protection provisions equivalent to or exceeding the protections afforded to individuals by the Data Protection Act 2018, the UK General Data Protection Regulation and other relevant legislation. The Society will not use the services of any other organisations based outside the United Kingdom.**
- n. ~~We~~ **The Society** will endeavour not to have data breaches. In the event of a data breach, ~~we~~ **the Society** will:-
 - i. endeavour to rectify the breach by getting any lost or shared data back; and
 - ii. evaluate ~~our~~ **its** processes and understand how to avoid ~~it~~ **a breach** happening again.

Serious data breaches, which ~~may~~ **might** risk someone's personal rights or freedoms, will be reported to the Information Commissioner's Office within 72 hours and to the individual concerned.
- o. To uphold this Policy, ~~we~~ **the Society** will maintain a ~~set~~ **Handbook** of Data Protection Procedures for ~~our~~ **its** Board of Directors **Members and Officers** to follow.

4) Review

This Policy will be reviewed ~~every two years~~ **at least once every year but also in the event of:-**

- a. **any relevant changes in the law or guidance from the Information Commissioner's Office, Co-operatives UK Limited or the Football Supporters' Association;**
- b. **any relevant technological advances;**

- c. any data security issues that have arisen;
- d. any significant changes in the purpose, nature or context of the Society's data processing; or
- e. any data breach.

This Policy will be updated as appropriate following all such reviews.