



## **Red Imps Community Trust Privacy Notice**

### **Our contact details**

Name: Lincoln City Supporters' Society Limited (commonly known as Red Imps Community Trust)

Address: Rob Bradley Building Design, Greetwell Place, 2 Lime Kiln Way, Lincoln LN2 4US

Phone Number: None

Website: [www.redimpstrust.co.uk](http://www.redimpstrust.co.uk)

E-mail: [membership@redimpstrust.co.uk](mailto:membership@redimpstrust.co.uk)

Date of completion of this Privacy Notice: As shown in the page footer

## **The type of personal information we collect**

We currently collect and process some or all of the following information:

- personal identifiers and contacts (for example, name, date of birth and contact details) for:-
  - our members;
  - delegates appointed by our corporate members to speak, attend and vote at our meetings on their behalf;
  - an adult with parental responsibility for each of our members who is under 18 years of age;
  - non-member third parties with whom we deal;
- records of the benefits due to and received by our John O’Gaunts Club Gold Legacy members;
- details supplied by our bank and by the service providers that we use for card payments, online payments and e-commerce when payments are received from our members and from non-member third parties;
- details of any bank accounts to which we should make payments, such as of interest due to holders of our Stacey West Investment Bonds;
- information provided by candidates elected or seeking election to our Board of Directors;
- records of the roles held, appointment dates and term expiration dates for our Board Members and Officers;
- the names of any societies, companies or authorities to which our Board Members have close links, including directorships and senior positions;
- records of whether our Board Members are disqualified under the Company Director Disqualification Act 1986;
- records of (a) attendances at our meetings or events, the appointment of proxies and the submission of apologies for absence, (b) proposers, seconders and speakers for or against resolutions and (c) votes cast or abstentions from voting;
- records of interactions with us, for example by post, email, social media, website enquiries or in-person attendance at meetings or events;
- records of our members who have opted out of receiving regular emailed updates from us;
- photographs, images, sound recordings and videos.

We do not collect any “special categories” of sensitive personal data which, if held, would require a higher level of protection, namely personal data revealing:-

- racial or ethnic origins;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;

- biometric data;
- data concerning health, sex life or sexual orientation.

## **How we get the personal information and why we have it**

Most of the personal information we process is provided to us directly by you, such as when you:

- apply to join us as a member;
- complete hard copy or online forms;
- contact us;
- buy merchandise from us;
- attend our meetings or events.

We also receive personal information indirectly, from the following reliable and reputable sources in the following scenarios:

- Lincoln City Football Club Company Limited ("the Club"), with which (in order to protect your privacy) we have a Data Sharing Agreement, covering (a) membership of our organisation being a benefit (subject to a right to opt out) provided automatically to all the Club's Gold, John O'Gaunts, Silver, Bronze, Young Imps, Junior Imps and Little Imps Members and (b) the joint venture between the Club and us known as the "John O'Gaunts Club", under which our John O'Gaunts Club Gold Legacy members are entitled to receive certain benefits from the Club;
- our bank, when payments are received by bank transfer, standing order or direct debit;
- our card services provider, when payments are received by credit card or debit card;
- our online services provider, when payments are received online;
- our e-commerce service provider, when merchandise is bought from us online;
- the providers of the social media channels that we use, when they share with us data about your usage of those channels.

We use the information we have collected in order to:

- comply with our rules, which constitute a contract between us and each of our members individually, including ensuring that all voting rights can be exercised and that all benefits receivable can be obtained;
- identify you as a person with whom we should communicate and to enable us to communicate with you;
- comply with our safeguarding obligations to our members who are under 18 years of age;
- operate in a manner in which you would reasonably expect us to operate, including respecting privacy, following proper management procedures,

keeping appropriate accounting records and respecting the wishes of members who opt out of receiving regular emailed updates from us;

- publicise and report on our meetings, events and activities;
- process membership renewals and respond to correspondence;
- pay interest due to holders of Stacey West Investment Bonds;
- recruit and monitor the work of Board Members, Officers and other volunteers who work for us;
- monitor your use of our social media channels;
- comply with the legal obligations imposed upon us, including by regulatory and official bodies, such as identity checks to combat money laundering by purchasers of Stacey West Investment Bonds;
- provide information that we are required to supply to the Financial Conduct Authority and any other regulatory or official body.

We do not undertake any automated decision making, nor do we undertake any profiling.

We may share this information with:-

- those of our Board Members and Officers who have a business need to process it in order to enable us to operate in a manner in which you would reasonably expect us to operate;
- those of our Board Members and Officers who are authorised by our Board of Directors to be permitted access to personal data for security backup purposes;
- the Club, in accordance with our Data Sharing Agreement with it, in relation to benefits due from the Club to our John O’Gaunts Club Gold Legacy members;
- our bank, when the authorised signatories on our accounts have to produce evidence of their identities or when we need to make payments, such as of interest due to holders of our Stacey West Investment Bonds;
- our mailshot services provider, so that we can circulate regular updates to our members;
- the provider of any third party digital platform that we may use to manage the voting process in respect of any decisions to be taken at our General Meetings or in the event of a decision having to be taken as to whether we should exercise our veto right under the Fans’ Share in the Club;
- our members, insofar as they are entitled to receive items, such as minutes of our meetings;
- the general public, insofar as you can reasonably expect us to share it in website and social media publicity about our meetings, events and activities;
- the auditor or independent examiner of our annual financial statements;

- any law enforcement or government body or organisation entitled to receive it.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing this information are:

**(a) We have a contractual obligation.** Our rules constitute a contract between us and each of our members individually.

**(b) We have a legitimate interest.** We can use your personal data:-

(i) if it is necessary for a specific Recognised Legitimate Interest listed in the Data (Use and Access) Act 2025, such as crime prevention and detection, public security and defence, emergency response and safeguarding; or

(ii) in ways that you would reasonably expect and which have a minimal privacy impact or where there is a compelling justification for the processing: you have a right to object to any processing that we undertake for our legitimate interests, which you can do by using the contact details shown on the first page of this document.

**(c) Your consent.** You are able to remove your consent at any time. You can do this by using the contact details shown on the first page of this document.

**(d) We have a legal obligation.** Legislation (such as the Co-operative and Community Benefit Societies Act 2014) imposes certain statutory duties on us. Various law enforcement agencies are also entitled to demand information in limited circumstances relating to money laundering, etc., as are government bodies, such as HM Revenue & Customs, in respect of interest payments, etc.

## **How we store your personal information**

Your information is securely stored by our authorised Board Members and Officers, either electronically (whether on individual devices or on a Cloud-based system) or in hard copy form. Controls are in place to prevent unauthorised access to or use of personal data.

Information is stored within the United Kingdom, unless we use the services of organisations based elsewhere that are subject the data protection provisions not materially lower than the protection afforded to individuals by the Data Protection Act 2018, the Data (Use and Access) Act 2025, the UK General Data Protection Regulation and other relevant legislation.

We keep personal information for the time periods specified below:

- in accordance with our rules, minutes of our meetings are retained permanently;
- records and documents relating to insurance policies will be retained indefinitely;
- membership information is retained for a maximum of one year following the cessation of membership;
- all other information may be retained for up to seven years, so that we can meet our legal, regulatory and contractual obligations.

If letters are returned undelivered because you have moved without providing a forwarding address and if electronic messages bounce back because your email address is no longer valid, we will delete the relevant contact information.

We dispose of your information by erasing electronic records (including backup copies) from all devices and locations on and in which they are stored and by shredding all hard copy records.

## **Your data protection rights**

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

**Your right to complain** – You have the right to complain formally to us about how we are handling your or other people’s information if you believe that we:-

- a) have not responded properly to your request for your personal information; or
- b) are not keeping information securely; or
- c) hold inaccurate information about you; or
- d) have disclosed information about you; or
- e) are keeping information about you for longer than is necessary; or
- f) have collected information for one reason and are using it for something else; or
- g) have not upheld any of your data protection rights; or
- h) have processed your personal data unlawfully.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please use the details shown on the first page of this document to contact us if you wish to make a request.

## **How to complain**

If you have any concerns about our use of your personal information, you can make a formal complaint to us:-

- a) either in hard copy form, using the postal address shown on the first page of this document;
- b) or online, using the contact form at <https://www.redimpstrust.co.uk/contact/>;
- c) or by sending an email to [membership@redimpstrust.co.uk](mailto:membership@redimpstrust.co.uk).

When making a formal complaint, you should:-

- a) include all relevant contact details, to help us to identify you;
- b) include full details of your concern;
- c) send copies of all key documents; and
- d) allow us a reasonable opportunity to investigate the complaint and to notify you of the outcome.

A template issued by the Information Commissioner's Office for making a formal complaint can be obtained from us on request or viewed online at <https://ico.org.uk/for-the-public/how-to-make-a-data-protection-complaint/>.

On receipt of a formal complaint, we will:-

- a) acknowledge its receipt within 30 days;
- b) request any clarification that we might need or any further information that might be required to enable us to verify that you are entitled to receive correspondence from us about your complaint;
- c) investigate the complaint and try to resolve it before you need to escalate it to the Information Commissioner's Office;

- d) notify you without undue delay of the outcome of our investigation, explaining clearly, if applicable, why we have used your information in the way that we have done or why we have refused a request.

When you receive the notification of the outcome of our investigation, you should:-

- a) let us know if you think that we have misunderstood you or not given a full response; and
- b) request clarification if you do not understand our response.

A template issued by the Information Commissioner's Office for seeking clarification of such a notification can be obtained from us on request or viewed online at <https://ico.org.uk/for-the-public/how-to-make-a-data-protection-complaint/>.

You can escalate your complaint to the Information Commissioner's Office if you are unhappy with how we have dealt with it.

The Information Commissioner's Office address is:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Information Commissioner's Office website: <https://www.ico.org.uk>