

Justification for proposal that the Data Protection Policy approved by the Society Board on 15th April 2026 should be ratified

As a matter of best practice and for reasons of transparency, ratification is always sought from Society Members at Annual General Meetings of any changes made by the Society's Board of Directors to the Society's policies.

Amendments made by the Society's Board of Directors on 18th December 2024 to the Society's Data Protection Policy were ratified by Society Members at the Annual General Meeting on 26th June 2025.

Further amendments (shown in red font on the following pages) were then made to that Policy by the Society's Board of Directors on 15th April 2026. Ratification of those further amendments is being sought from Society Members at the Annual General Meeting on 4th June 2026. Those further amendments are intended to ensure that the Society complies with changes made by the Data (Use and Access) Act 2025, which is coming into force in stages. Those further amendments do not undermine in any way whatsoever the Society's longstanding culture of respecting and taking care of personal information.

Much of the new Act does not impact on the Society, e.g. automated decision-making, scientific research, intimate images, digital verification services, legal professional privilege, national security, child death investigations, smart data, national underground assets, online registrations of births and deaths, etc.

Some of the new Act does however impact on the Society and therefore amendments have been made to address the following issues.

1. Already in force, when data protection rights are exercised, are new provisions for the reasonable and proportionate searches required and for the time limit for responses to be given.
2. Also already in force are slightly modified provisions for transfers of data internationally, which are relevant because the Society has some members who live abroad and also because it uses the services of multinational organisations, such as the cloud-based file management systems provided by Google and the social media platforms provided by "X", Facebook, etc.
3. Expected to come in to force on 19/06/26 is a new right for individuals to complain, with an obligation on organisations to attempt to resolve complaints internally.

Later in 2026, the Information Commissioner's Office is expected to be re-branded as the Information Commission. When that occurs, all references in the Data Protection Policy to the Information Commissioner's Office will be amended accordingly.



LINCOLN CITY SUPPORTERS' SOCIETY LIMITED Data Protection Policy

1) 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 **ratified at the Society's Annual General Meeting on 26th June 2025. It incorporates amendments that were approved pursuant to a resolution at the Society's Board Meeting on 15th April 2026 and those amendments 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 stored electronically or on paper. The overall focus is on embedding at

Amended version adopted on 15/04/26 by the Society Board, for ratification at the Society's AGM on 04/06/26, the original version being Aadopted by the ~~SocietyTrust~~ Board on 18/12/24 ~~&and~~ ratified ~~atby~~ the Society's ~~at~~ the AGM on 26/06/25

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"), 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 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. The Society needs to keep personal data about its members and third parties in order to carry out its activities.
- b. 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 Data (Use and Access) Act 2025**, the UK General Data Protection Regulation and other relevant legislation.
- c. The Society will only collect, store and use the minimum amount of data that it needs for clear specific purposes and will not collect, store or use data that 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. The Society will keep clear records of the purposes for collecting, storing and using specific data and ensure use only for 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 **or to complain about how the Society is handling personal data if they believe that the Society:-**

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- i. has not responded properly to their request for their personal information; or
 - ii. is not keeping information securely; or
 - iii. holds inaccurate information about them; or
 - iv. has disclosed information about them; or
 - v. is keeping information about them for longer than is necessary; or
 - vi. has collected information for one reason and is using it for something else; or
 - vii. has not upheld any of their data protection rights; or
 - viii. has processed their personal data unlawfully.
- h. 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 **or to complain**.
- i. 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. 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. 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 **not materially lower than 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. The Society will endeavour not to have data breaches. In the event of a data breach, the Society will:-
- i. endeavour to rectify the breach by getting any lost or shared data back; and
 - ii. evaluate its processes and understand how to avoid a breach happening again.
- Serious data breaches, which 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. The Society will:-**

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- i. maintain a formal complaints process, which for transparency and accessibility purposes will be publicised in a Privacy Notice;
 - ii. acknowledge receipt of all formal complaints within 30 days;
 - iii. investigate all formal complaints, trying to resolve them before they are escalated to the Information Commissioner's Office;
 - iv. notify without undue delay all complainants of the outcome of their formal complaint; and
 - v. notify all complainants of their right to escalate their formal complaint to the Information Commissioner's Office.
- p. To uphold this Policy, the Society will maintain a Handbook of Data Protection Procedures for its Board Members and Officers to follow.

4) Review

This Policy will be reviewed 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.