

# PRIVACY POLICY

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## Privacy Policy

### 1. PURPOSE OF DOCUMENT

This Privacy Policy describes how personal data we collect from our members and other users of our services will be collected, stored and processed.

This policy is to be read in conjunction with the TST Website Privacy Statement which describes how data is collected and used on the TST Website.

### 2. INTRODUCTION

The Sabre Trust is a Charitable Incorporated Organisation and registered in England and Wales with the Charity Commission registered number 1161190. The Sabre Trust is the data controller under data protection legislation.

TST is the owner of [www.thesabretrust.co.uk](http://www.thesabretrust.co.uk) and the website is managed by Squarespace.com. For the purposes of data protection legislation, TST is the data controller.

### 3. THE INFORMATION WE COLLECT ABOUT YOU

#### 3.1 WHEN USING OUR WEBSITE, OR INTERACTING WITH US VIA EMAIL AND TELEPHONE

TST is committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act (DPA) 1998 up to 24 May 2018 and the General Data Protection Regulation (GDPR) on and from 25 May 2018 (Data Protection Legislation). This policy explains how the information we collect about you is used and kept securely.

We may collect the following information about you through our website at [www.thesabretrust.co.uk](http://www.thesabretrust.co.uk)

- Your name, email address, postal address, bank details and any other information you voluntarily provide to us via our website and online forms.
- Your IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) which is automatically recognised by the web server.

For further information with regards to the information we collect from you when you use our website please see our privacy statement.

#### 3.2 WHEN APPLYING FOR A GRANT

By applying for a grant from The Sabre Trust you or your legal guardian consent to the applicant being bound by all relevant rules, codes and policies governing the activities and conduct of the organisation.

If you choose to apply for a grant we will collect the following information about you through our online application form.

- Name, date of birth, gender, email address, address, up to 2 telephone numbers, bank account details and whether you consent to being contacted by an assessor. We will also assign you a unique application reference number. We refer to this data as 'Application Data'.
- You will be given the option to provide your ethnicity which will be used anonymously for equality reporting.
- You will be given the option to provide information on any disability that you have which will be used anonymously for equality reporting.

You will be given the option to share your disability information with grant assessors which will be used by them to formulate an assessment of your grant application.

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### 3.3 PUBLICITY

Occasionally we take photos or videos of fencing activities. We may use these images in printed material that we produce, in displays and on our website. We also send images to the news media, or our activities/events/competitions may be visited by the media who will take their own photographs or film footage (for example, of a visiting dignitary or other high profile event). People will often appear in these images. The news media may use the images in printed publications (including local or national newspapers), on televised news programmes or on their website. They then store them in their archive. They may also syndicate the photos to other media for possible use, either in printed publications, on websites, or both. When we submit photographs and information to the media, we have no control on when, where, if or how they will be used.

To comply with Data Protection Legislation, we need your permission before we can photograph or make any recordings of you/your child. We will supply consent forms relating to the activity that you are participating in which explain how we will store and use photographs and images arising from an event.

Version 1.0

### 4. THE INFORMATION PROVIDED TO US BY OTHERS

We may also be provided with information about you from clubs or partners with which you are registered.

They will ask your permission to pass the necessary information onto us.

That information may include: British Fencing membership number, name, date of birth, gender, email address, address, telephone number, Home Country/Regional affiliations, name of the British Fencing affiliated Clubs with which you are registered and any coaching or officiating licenses that you hold. (Fencing Data).

### 5. HOW WE USE YOUR INFORMATION

We will collect and process your personal data on the basis of legitimate interests - for the purposes of providing the services that you have requested from us .

On the basis of legitimate interests we may use your personal information for a number of purposes, including:

- To deliver the services that form a part of the application you have made.
- To deal with your requests and enquiries.
- We will process your Fencing Data and any optional data that you supply on the application form on the basis of the following legitimate interests:
  - For the purposes of completing the Annual Report to the Charity Commission in accordance with the legal requirements of a registered charity.
  - For the purposes of submitting financial reports and data to the accountants and auditors in accordance with the legal requirements of a registered charity.

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When we collect information from you, we will tell you if we would like to send you information about our products and services. We will give you the opportunity to opt in to any such communications and will tell you how you can opt-out at any time.

If you choose to opt-in to additional communication we will use your personal data on the basis of consent.

Where you have opted into additional communications we will process your Application Data on the basis of consent.

A) in your communication preferences section of your online application form or

B) by opting into communications through Social media, website, responding to emails

Please see the Communications section below for more information.

### 6. SHARING YOUR INFORMATION

#### 6.1 INDEPENDENT CONTRACTORS (VOLUNTEERS)

Much of the work that is performed by The Sabre Trust is performed by volunteers. In order to perform their roles it may be necessary to pass on personal information to people that are not employed by The Sabre Trust. We will share only what is needed for the purposes of the administration of a registered charity. Where possible we will anonymise data before sharing. If we would like to share your information for any other purpose we will ask for your consent.

#### 6.2 ADMINISTRATIVE BODIES

Kreston Reeves Financial Planning Limited,  
9, Donnington Park, Chichester, PO207AJ  
01243 787627

If we wish to share your data with third parties (eg sponsors) for marketing purposes (or eg The Prince's Trust) to assist with your needs, we will tell you about this and only do so if we get your consent. You can opt out at any time either by notifying us or by updating your privacy preferences on your online membership portal.

TST may also share your personal information with the police and other law enforcement and statutory agencies for the purposes of crime prevention or investigation and supporting work to safeguard children and vulnerable adults participating in sport.

If we disclose your information, we ask the organisation to demonstrate that the data will assist in the prevention or investigation of crime or that TST is legally obliged to disclose it.

This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

### 7. PROTECTING YOUR INFORMATION

The data that we collect from you may be transferred to a destination external to TST's own secure network.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet. We use up-to-date industry procedures to protect your personal information. We also protect the security of your data using Secure Sockets Layer (SSL) encryption technology.

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### 8. RETAINING YOUR INFORMATION

#### 8.1 APPLICATION DATABASE

We will retain your Application Data for such time as you are a client registered with us and will then delete your information on a staged basis as follows:

#### Type of info

##### Application Data

Seven years after an individual has not played an active part in the charity.

##### Name and date of birth, postcode

This information will be anonymised after the seven year period referred to above.

##### Date of deletion

#### 8.2 SAFEGUARDING

Safeguarding case information and concerns will be stored indefinitely.

#### 8.3 MEDICAL RECORDS

The only medical records The Sabre Trust will be keeping will be the medical information volunteered on the application form, and such notes made by the assessors in relation to individual applications. Medical records which are a material part of an application will be retained for 6 years.

See Application Database above for destruction details.

#### 8.4 CRIMINAL RECORD CHECKS

Where DBS checks are carried out on its assessors, The Sabre Trust does not typically retain copies of certificates. TST will note the date on which the check has been performed and the status of the check.

In some cases a certificate contains information which impacts a recruitment or registration decision. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

### 9. COMMUNICATIONS

We will communicate with you through email, notices posted on our websites and other means. By joining British Fencing you are indicating your consent to receive statutory notices to the email address you supply and accept that you are responsible for updating our records if your email address or other personal details change.

It is not the intention of The Sabre Trust to send you communication you do not wish to receive. In an effort to keep costs down we may not in all cases be able to provide you with an alternative communication method.

All email messages to or from The Sabre Trust may be monitored to ensure compliance with internal policies and for our mutual protection.

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### 9.1 E-NEWSLETTER

Cut and Thrust- which is the magazine for TST clients is usually posted on the website. We may use a third party provider to deliver our e-newsletters via email. These e-newsletters can be signed up to via the TST website or social media links. We may use a third party provider/ software to deliver our e-newsletters and manage the opt-in/out and unsubscribe facilities. If you (through the sign-up process) consent to us sending you these types of communications, we will let you know who the third party provider is at that time.

### 9.2 SURVEYS

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All newsletters will contain instructions about how to opt-out of that newsletter and also unsubscribe to all similar e-newsletters.

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletters.

We regularly carry out surveys using a third party provider, Survey Monkey ([www.surveymonkey.com](http://www.surveymonkey.com)). These surveys may be accessible through our website.

When we collect your personal data through our website (eg through newsletter sign-ups) we may ask you for your consent to participate in our surveys.

When we collect your personal data through our membership data we will ask whether you wish to receive these surveys.

If you have provided consent to participate, we will transfer your data to Survey Monkey for these purposes only.

In each survey, we will clearly tell you what personal data we are collecting, why we are collecting it and what it will be used for. We will provide a link to terms and conditions for any incentives offered to take part in that survey. We do not link any other information about your browsing activity with the survey data, which is stored separately.

### 9.3 OTHER SERVICE AND MARKETING MESSAGES

Our communications may include emails which help inform you about matters relevant to your membership terms and conditions and emails related to the proper functioning of your account.

If you are currently receiving service messages or marketing communications from TST and no longer wish to do so, please let us know by contacting us at [headoffice@britishfencing.com](mailto:headoffice@britishfencing.com).

## 10. YOUR RIGHTS AND FINDING OUT WHAT INFORMATION TST HOLDS ABOUT YOU

All individuals who are the subject of personal data held by us are entitled to:

- ask what information we hold about them and why
- ask how to gain access to it
- be informed of how to keep it up to date
- have inaccurate personal data corrected or removed
- prevent us from processing information or request that it is stopped if the processing of such data is likely to cause substantial, unwarranted damage or distress to the individual or anyone else
- require us to ensure that no decision which significantly affects an individual is solely based on an automated process for the purposes of evaluating matters relating to him/her, such as conduct or performance
- be informed what we are doing to comply with our obligations under the Data Protection Act.

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This right is subject to certain exemptions which are set out in the Act.

Under the Data Protection Legislation, you can ask to see any personal information that we hold about you. Such requests are called Subject Access Requests.

Subject Access Requests should be made in writing to the address given below.

### Fees

We will not charge a fee for this. However, we will charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We will also charge a reasonable fee to comply with requests for further copies of the same information.

The fee will be based on the administrative cost of providing the information.

### Timescales

We aim to comply with requests for access to personal information as quickly as possible. In most cases we will be able to provide a copy of the information within one month of receipt of your written request. In order to do this we may ask you to provide additional details about the source, location and timeframe of the information you are requesting.

We may on occasions extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

### Manifestly unfounded or excessive requests

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- charge a reasonable fee taking into account the administrative costs of providing the information; or
- refuse to respond.

If we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

### How will the information be provided?

We will verify the identity of the person making the request, using reasonable means.

Where the data is stored on the membership system you will be provided with direct access to your data via that system.

Where the data is published on the BF website, you will be provided with the links to the website.

### Requests for large amounts of personal data

If your request requires us to process a large quantity of information, we will ask you to specify the information the request relates to.

### Rights and freedoms of others

The right to obtain a copy of information or to access personal data should not adversely affect the rights and freedoms of others. If by providing the information requested we would have to disclose information relating to or identifying a third party, we will only do so provided the third party gives consent, otherwise we may edit the data to remove the identity of the third party.

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Unless we are under a legal obligation to release data, or the individual has given us permission, personal information will only be released to the individual to whom it relates. The disclosure of such information to anyone else without their consent may be a criminal offence.

### Making a Subject Access Request

If you would like to make a Subject Access Request, please contact TST's Data Protection Officer:

Data Protection Officer  
24, Priors Acre, Boxgrove,  
Chichester,  
West Sussex, PO18 0ER

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source, location and timeframe of the information you are requesting.

### 11. QUESTIONS ABOUT THE POLICY

If you have any questions about this Policy, please contact TST's Data Protection Officer at the address below.

### How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at .

Data Protection Officer  
24, Priors Acre, Boxgrove, Chichester  
West Sussex, PO18 0ER  
Or  
[infothesabretrust.co.uk](mailto:infothesabretrust.co.uk)

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

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

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>