

Data Protection Policy

Context and Overview

Key Details

- Policy prepared by: Bill Shone/Tony Ward
- Policy operational from: 22nd February 2015
- Latest revision date: 23rd November 2017
- Next review date: 23rd November 2019

Introduction

Crazy Legs Events needs to gather and use certain information about individuals.

These include the following information that is gathered from customers, either directly for events managed by Crazy Legs Events, or indirectly when Crazy Legs Events are providing race services such as timing;

- Name
- Gender
- Age/Date of Birth
- Telephone Number and Emergency Contact Telephone Number
- Address
- E-mail address
- Sports Governing Body Registration Numbers

The information is used for race administration, safety during the race and for marketing purposes if the individual gives consent.

This policy describes how this personal data must be collected, handled and stored to meet the company's data protection standards and to comply with the law.

Why this policy exists

This Data Protection Policy ensures Crazy Legs Events:

- Complies with data protection law and follows good practice
- Protects the rights of staff, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

Data protection law

The Data Protection Act 1998 describes how organisations – including Crazy Legs Events – must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper, or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Data Protection Act is underpinned by eight important principles. These say that personal data must:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up to date

5. Not be held for any longer than necessary
6. Processed in accordance with the rights of data subjects
7. Be protected in appropriate ways
8. Not be transferred outside the European Economic Area (EEA), unless that country or territory also ensures an adequate level of protection

Policy risks and responsibilities

Policy scope

This policy applies to:

- All staff and volunteers of Crazy Legs Events
- All contractors, suppliers and other people working on behalf of Crazy Legs Events

It applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside the Data Protection Act 1998. This can include:

- Names of individuals
- Postal addresses
- E-mail addresses
- Telephone numbers
- ..plus any other information relating to individuals

Data protection risks

This policy helps to protect Crazy Legs Events from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, data being given out inappropriately
- **Failing to offer choice.** For instance, all individuals should be free to choose how the company uses data related to them
- **Reputational damage.** For instance, the company could suffer if hackers successfully gained access to sensitive data.

Responsibilities

Everyone who works for or with Crazy Legs Events has some responsibility for ensuring data is collected, stored and handled appropriately.

Each team that handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

The Directors of Crazy Legs Events are ultimately responsible for ensuring that Crazy Legs Events meets its legal obligations. Specific responsibilities are:

- Awareness of data protection responsibilities, risks and issues
- Reviewing all data protection procedures and policies, in line with an agreed schedule
- Arranging data protection and advice for the people covered by this policy
- Handling data protection questions from anyone covered by this policy
- Dealing with requests from individuals to see the data Crazy Legs Events holds about them (also called 'subject access requests')
- Checking and approving any contracts or agreements with third parties that may handle the company's sensitive data
- Ensuring all systems, services and equipment used for storing data meet acceptable security standards
- Performing regular checks and scans to ensure security hardware and software is functioning properly

- Evaluating any third-party services the company is considering using to store or process data. For instance, cloud computing services
- Approving any data protection statements attached to communications such as emails or letters
- Addressing any data protection queries from journalists or media outlets like newspapers
- Where necessary, ensuring that marketing initiatives abide by data protection principles

General staff and volunteer guidelines

- The only people able to access data covered by this policy should be people who **need it for their work**
- Data **should not be shared informally**.
- **Crazy Legs Events will provide training and guidance** to volunteers and contractors to help them understand their responsibilities when handling data.
- All data should be kept secure by taking sensible precautions and following the guidance below.
- In particular, **strong passwords must be used**, and they should never be shared.
- Personal data **should not be disclosed** to unauthorised people, either within the company or externally.
- Data should be **regularly reviewed and updated**. If it is found to be out of date or no longer required, it should be deleted and disposed of.
- Staff or volunteers **should request help** if they are unsure about any aspect of data protection.

Data storage

These rules describe how and where data should be safely stored.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot see it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a secure place**.
- Paper and printouts are **not left where unauthorised people can see them**.
- **Data printouts should be shredded** and disposed of when no longer required.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared with third-parties.
- If data is **stored on removable media** (like a CD or DVD), these should be kept in a secure place when not being used.
- Data should only be uploaded to an **approved cloud computing service**.
- Servers containing personal data should be **sited in a secure location**, away from general office space.
- Data should be **backed up regularly** to an approved cloud computing service.
- Data should never be saved directly onto mobile devices such as phones.
- All servers and computers containing data should be protected by **approved security software**.

Data Use

Personal data is of no value to Crazy Legs Events unless the business can make use of it. However, it is when data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, **screens of computers are always locked** when left unattended.
- Personal data **should not be shared informally** with third parties.
- Personal data **should not be transferred outside of the European Economic Area**.

Data Accuracy

The law requires Crazy Legs Events to take reasonable steps to ensure data is kept accurate and up to date.

- Data will be held in as **few places as necessary** with no unnecessary additional data sets created.
- Crazy Legs Events will make it **easy for data subjects to update the information it holds about them** and will process updates promptly.
- Data will be **updated as inaccuracies are discovered**.

Subject Access Requests

All individuals who are the subject of personal data held by Crazy Legs Events are entitled to:

- Ask **what information** the company holds on them and why.
- Ask **how to gain access** to it.
- Be informed **how to keep it up to date**.
- Be informed how the company is **meeting its data protection obligations**.

If an individual contacts the company requesting some or all of this information, this is called a subject matter request.

Subject access requests should be made via e-mail to enquiries@crazylegsevents.co.uk . The identity of the person making the enquiry will be verified before any information is disclosed.

Disclosing data for other reasons

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances Crazy Legs Events will disclose requested data after verifying that the request is legitimate.

Providing Information and privacy

Crazy Legs Events aims to ensure that individuals are aware that their data is being processed and that they understand:

- How the data is being used
- How to exercise their rights

Data relating to individuals is used for the management of events promoted by Crazy Legs Events or other event promoters where Crazy Legs Events are providing event services such as timing, registration or results.

Data may be shared with other organisations where the organisation is promoting an event that Crazy Legs Events are providing event services for. Data will not be shared with any other organisation.