LTSB Privacy Policy

This website (ltsb.charity) is operated by Leadership through Sport & Business (LTSB).

1. Introduction

Leadership through Sport & Business (LTSB) understands that your privacy is important to you and that you care about how your personal data is used and shared.

We are committed to protecting your privacy and handling it lawfully, fairly and transparently in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy explains how we collect, use, store and protect your personal data when you:

- Visit our website
- Participate in our programmes
- Make a donation
- Volunteer or apply for a role
- Attend our events
- Partner with us
- Or otherwise interact with us (including over the phone, face-to-face or in writing).

It also explains your rights in relation to your personal data and how you can manage your communication preferences.

This policy is intended to assist you in making informed decisions when using the website and our services and/or to understand how your personal data may be processed as a result of providing the Services to others or as part of an application to work for LTSB. Please take a moment to read it.

This policy applies only to personal data processed by LTSB. It does not apply to personal data collected by third parties, including where you access external websites via links on our website.

If you have any queries about this policy or how we handle your personal data, please contact: info@ltsb.charity.

2. Information about us

Leadership through Sport & Business (LTSB) is a registered charity in England and Wales (No. 1147616) and in Scotland (OSCR No. SC052928). We are a company limited by guarantee registered in England and Wales No. 08033634.

Our registered address is:

LTSB C/O Graeme Hughes,
Brabners,
Horton House,
Exchange Flags,

Liverpool, Merseyside,
L2 3YL.

Email: info@ltsb.charity

For the purposes of UK data protection law, LTSB is the data controller of your personal data. This means we are responsible for deciding how your personal data is collected and used.

3. What is personal data?

Personal data is defined by the UK GDPR as 'any information relating to an identified or identifiable natural person ('data subject') who can be identified, directly or indirectly'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

4. What are my rights?

As a data subject, you have the following rights under UK data protection law, which this Policy and our use of personal data have been designed to uphold:

- The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more.
- The right of access to the personal data we hold about you.
- The right to rectification if any personal data we hold about you is inaccurate or incomplete.
- The right to be forgotten, i.e. the right to ask us to delete any personal data we hold about you.
- The right to restrict (i.e. prevent) the processing of your personal data.
- The right to object to us using your personal data for particular purposes.
- The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- Rights with respect to automated decision making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

Further information about your rights can also be obtained from the Information Commissioner's Office.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

5. What data do we collect?

Depending on how you interact with us, we may collect the following types of personal information:

- Name
- Date of birth
- Gender
- Business/Company name
- Job title
- Profession
- Contact information such as email addresses and telephone numbers
- Demographic information such as postal code, preferences and interests
- Payment details (such as credit card or debit card information where you make donation or payment).

In certain circumstances, we may collect special category data, such as information about your health, other sensitive information, where this is necessary for programme delivery, safeguarding or to respond appropriately to your needs.

We will only collect and process special category data where we are permitted to do so in accordance with UK data protection law and where appropriate additional safeguards are in place.

We also collect non-personal and technical information relating to your use of our website, such as:

- IP address
- Web browser type and device information
- Pages visited and time spent on our website

We may also receive information about you from independent third parties, such as fundraising sites like Just Giving or event organisers such as the London Marathon. We will only receive information from third parties in this way if you have given your consent for your information to be passed on to us. You should check their privacy policy when you provide your information to understand how they will process your information. Once we have obtained this information from the third party it will be covered by our privacy policy as well as by the originating third party.

6. How do you use my personal data?

We use your personal data for purposes including, but not limited to:

- Delivering and managing our programmes and services, including assessing eligibility, providing appropriate support and fulfilling safeguarding responsibilities
- Communicating with you and responding to enquiries
- Processing donations, payments and Gift Aid claims
- Administering fundraising activities and events
- Managing volunteering, employment and recruitment processes
- Monitoring, evaluating and improving our services

- Complying with legal, regulatory and safeguarding obligations

We may also use personal information to carry out due diligence so that we are fundraising in accordance with the UK data protection law, the code of fundraising practice and our internal policies and procedures

With your permission, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone and post with information, news, and offers on our services and programmes which we believe you may be interested in. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with UK data protection laws and the Privacy and Electronic Communications Regulations 2003 (PECR), and you will always have the opportunity to opt-out.

We will only process your personal data where we have a lawful basis to do so. Where we rely on your consent (for example, for certain marketing purposes), you may withdraw your consent at any time.

7. How long will you keep my personal data?

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected and to comply with legal, regulatory and accounting requirements. In many cases, financial and contractual records must be retained for a minimum of six years.

Exceptions to this rule are:

- We will delete or irreversibly anonymise special category data as soon as it is no longer required for the purpose it was collected, unless we are required to retain it for longer (for example, for safeguarding, legal or regulatory reasons).

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after your interaction with us. It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address, by contacting us on info@ltsb.charity.

8. How and where do you store or transfer my personal data?

We store and process personal data within the United Kingdom and the European Economic Area (EEA).

In limited circumstances, personal data may be transferred outside the UK or EEA (for example, where we use secure cloud-based service providers). Where this occurs, we ensure that appropriate safeguards are in place in accordance with UK data protection law.

These safeguards may include:

- Transfers to countries deemed to provide an adequate level of protection by the UK Government; or

- The use of UK-approved Standard Contractual Clauses or other legally recognised transfer mechanisms.

We take reasonable steps to ensure that any third-party organisations processing personal data on our behalf handle it securely and in line with our contractual requirements.

9. Do you share my personal data?

We are committed to protecting your personal data and will never sell your information to other charities or third parties.

We may share your personal data with carefully selected third parties who act on our behalf and help us deliver our services. These may include:

- Service providers who support our operations, such as IT systems, email communication platforms, payment processors or payroll providers
- Professional advisers where necessary (for example, legal or audit advisers)
- Delivery partners who help us provide our programmes and services

If any of your personal data is required by a third party, as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with UK data protection law.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How can I control my personal data?

You have control over how we use your personal data, particularly in relation to marketing communications.

Where you provide your details to us, you may be given the option to choose how you would like to hear from us. We will only send you marketing communications where we have a lawful basis to do so, such as your consent or our legitimate interests (where permitted by UK data protection law).

You can opt out of receiving marketing communications from us at any time by:

- Clicking the “unsubscribe” link in any marketing email we send you
- Contacting us at info@ltsb.charity.
- Updating your communication preferences where this option is available

We will act on your request as soon as reasonably possible.

You may also register with one of the UK preference services, such as:

- The Telephone Preference Service (TPS)
- The Corporate Telephone Preference Service (CTPS)

- The Mailing Preference Service (MPS)

These services can help reduce unsolicited marketing communications. However, they will not prevent you from receiving communications that you have specifically requested or consented to receive from us.

11. Can I withhold information?

You may visit our website without providing personal data.

However, to access certain services, participate in programmes, make a donation or apply for a role, you may be required to provide specific personal information. If you choose not to provide information that is necessary for these purposes, we may be unable to provide the relevant service or respond to your request.

12. How can I access my personal data?

You have the right to request a copy of the personal data we hold about you. This is known as a “subject access request”.

Requests can be made by contacting us at:

Email: info@ltsb.charity.

Postal address: LTSB C/O Graeme Hughes, Brabners LLP, Horton House, Exchange Flags, Liverpool, L2 3YL.

There is normally no charge for making a request. However, we may charge a reasonable fee or refuse to act on a request if it is manifestly unfounded or excessive.

We will respond to your request without undue delay and in accordance with applicable UK data protection law. If your request is complex or we receive multiple requests, it may take us longer to respond. Where this is the case, we will inform you.

We may request proof of identity before responding to your request.

13. How do we use cookies?

Cookies are small data files that are served by our platform and stored on your device. Our site uses cookies dropped by us or third parties for a variety of purposes including to operate and personalise the website and to ensure you see content that is relevant to you.

Our website uses cookies and similar technologies to improve user experience and analyse website traffic.

When you first visit our website, you will be presented with a cookie banner allowing you to accept or reject non-essential cookies.

You can manage your cookie preferences at any time through your browser settings or via our cookie management tool.

It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser

and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

For full details about the cookies we use, please see our separate Cookie Policy.

14. How do I contact you?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details:

For the attention of:	Head of Operations
Email address:	info@ltsb.charity
Postal Address:	LTSB C/O Graeme Hughes, Brabners, Horton House, Exchange Flags, Liverpool, Merseyside, L2 3YL.

15. Changes to this Privacy Policy

We may change the terms of this privacy statement on occasion but will not reduce your rights under this Privacy Policy without your explicit consent. If we do so, we will post the changes here, so please check from time to time. The latest policy version will always be available on our website.

If you have any questions about this policy or how we use data, please contact us at the above address or via email to info@ltsb.charity.

16. Data Protection Regulator

The Information Commissioner's Office (ICO) is the UK's independent authority responsible for upholding information rights and data protection law.

You have the right to lodge a complaint with the ICO if you are unhappy with how we have handled your personal data. The ICO can also provide further information and guidance about your data protection rights.

Further details are available at www.ico.org.uk or by calling 0303 123 1113.

17. Fundraising Preference Service

LTSB is committed to empowering our supporters to manage their information. The Fundraising Preference Service (FPS) enables donors to take control of their charitable giving and conversations; and we want to help you use the service effectively.

LTSB supports the Fundraising Regulator and its efforts to develop the Fundraising Preference Service as a means of rebuilding trust between charities and the public. The Charity is committed to upholding fundraising best practice and being as transparent as possible with our donors.

LTSB