

David Lloyd Clubs Together Foundation

Data Protection Policy

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A. Introduction

This policy sets out the David Lloyd Clubs Together Foundation’s (DLCTF) approach to data protection.

The Foundation is committed to protecting the privacy and personal data of all individuals with whom it works. This policy explains how the Foundation collects, uses, stores and protects personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant Charity Commission guidance.

This policy reflects the Foundation’s status as an independent charity while recognising that, during the initial phase of operation, it relies on systems, processes and support provided by David Lloyd Leisure (DLL).

This policy applies to:

- Trustees of the Foundation
- Employees and secondees working on Foundation activities

- Volunteers acting on behalf of the Foundation
- Delivery partners, contractors and suppliers processing data on the Foundation's behalf.

It applies to all personal data processed by the Foundation, whether held electronically or in paper form

B. Status

All members of the team carrying out activities for the Foundation are expected to comply fully with this policy and the principles of GDPR.

Any actual or attempted breach of this policy and any instructions or procedures following from this policy, whether deliberate or through negligence, may lead to disciplinary action being taken or even a criminal prosecution. Any breach of this policy must be notified to the trustees immediately.

C. Definition of key terms

Personal data means information relating to a living individual from which they can be identified. Personal data can be factual (such as a name, address or date of birth) or it can be an opinion (such as a performance appraisal or a note written in a free text field). It can even include a simple e-mail address. Mere mention of someone's name in a document does not constitute personal data, but personal details such as someone's contact details or salary do.

Special category personal data includes: racial or ethnic origin; political opinions, religious or philosophical beliefs, or trade-union membership; genetic data and biometric data (for the purpose of uniquely identifying a natural person); data concerning health; or data concerning a natural person's sex life or sexual orientation. In most cases, special category personal data can only be processed with the express permission of the person concerned.

Processing is any activity that involves use of the data. It includes collecting, recording or holding the data, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing includes transferring personal data to third parties.

The data *Controller* means the person(s) or organisation(s) who determine the purpose and means of processing. For the purposes of data protection legislation, the DLCTF is the Controller in respect of personal data processed for its charitable activities. Where the Foundation uses DLL systems or services, data processing roles and responsibilities will be clarified through written agreements, ensuring that the Foundation retains appropriate control and oversight.

D. Types of Personal Data Processed

The Foundation aims to minimise the personal data it collects. Data processed may include:

- Contact details of trustees, employees, secondees, volunteers and delivery partners
- Contact and organisational details of grant applicants and funded organisations
- A range of data relating to employees, including date of birth, sex, education and qualifications, work experience, National Insurance number, emergency contact details, and employment history with the organisation
- Limited personal data relating to programme participants (e.g. age range, attendance)
- Safeguarding-related information where necessary and lawful
- Monitoring, evaluation and feedback data, usually anonymised.

The Foundation does not routinely collect special category personal data. Where such data is required (for example, safeguarding or accessibility needs), it is processed lawfully, fairly and with appropriate safeguards.

E. Lawful Basis for Processing

The Foundation will only process personal data where there is a lawful basis to do so, including:

- Legal obligation – e.g. charity governance, reporting and safeguarding duties
- Legitimate interests – e.g. administering grants, managing relationships with partners
- Consent – e.g. where explicit permission is required, particularly for special category data or images.

The lawful basis for each category of processing will be documented.

The DLCTF will comply with UK data protection legislation, including the UK GDPR and the Data Protection Act 2018. It is registered with the Information Commissioner's Office (ICO) as a data controller. Where third parties process personal data on DLCTF's behalf, appropriate Data Processing Agreements will be in place. DLCTF will also provide clear privacy notices to individuals explaining how their personal data is used and outlining their data protection rights.

F. Data Protection Principles

The Foundation adheres to the principles of data protection. Personal data will be:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Retained only for as long as necessary

- Processed securely using appropriate technical and organisational measures.

G. Rights of Individuals

Individuals whose personal data is processed by the Foundation have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request erasure of data where appropriate
- Object to or restrict processing
- The right to be informed
- The right to data portability
- The right to lodge a complaint with the Controller (UK only)
- Certain rights with respect to automated decision-making and profiling.

Requests should be made in writing to the Foundation's nominated data protection contact. Requests will be handled within statutory timescales.

H. Data Sharing and Third Parties

The Foundation may share personal data with:

- Delivery partners and suppliers, where necessary for programme delivery
- David Lloyd Clubs, where systems or operational support are provided
- Regulators or authorities where legally required.

All third parties processing data on behalf of the Foundation must provide appropriate assurances of GDPR compliance. Data sharing arrangements will be documented.

I. Data Security

The Foundation will take appropriate steps to protect personal data, including:

- Secure storage within approved systems
- Restricted access on a need-to-know basis
- Use of DLL information security controls where systems are shared
- Training and awareness for those handling personal data.

Any actual or suspected data breach must be reported immediately in line with agreed procedures.

J. Data Retention and Disposal

Personal data will be retained only for as long as necessary for the purpose for which it was collected, and in line with legal and regulatory requirements.

When data is no longer required, it will be securely deleted or destroyed.

K. Images, Photography and Case Studies

Photographs, videos or case studies involving identifiable individuals (especially children) will only be used with appropriate consent and in line with safeguarding requirements.

L. Responsibilities

- Trustees are collectively responsible for ensuring compliance with data protection law
- A nominated trustee oversees data protection compliance
- All individuals handling personal data must follow this policy and associated procedures.

M. Reporting breaches

Any breach of this policy must be notified to the trustees immediately via privacy@davidlloyd.co.uk.

N. Further Information

Queries about this policy or data protection matters should be directed to the Foundation's nominated contact.

O. Policy review

This policy will be reviewed every two years, as a minimum.

Date of approval: April 2026

Date of next review: April 2028

Annex 1

The Foundation's nominated individual is Mark Dillon, who can be contacted via privacy@davidlloyd.co.uk.