

# **WATFORD BOROUGH COUNCIL**

## **Data Privacy Notice Under GDPR**

### **The identity and contact details of the company**

This Privacy Notice has been provided by Watford Borough Council, Community & Environmental Services Sports Development who is the Data Controller

#### **Who we are?**

Watford Borough Council ('we' or 'us') are a 'data controller' for the purpose of the General Data Protection Regulations, (i.e. we are responsible for, and control the processing of, your personal information).

This notice explains why we ask for your personal information, how that information will be used and how you can access your records; this notice also explains what we do with it and who it might be shared with.

#### **Why do you need my information?**

We collect and hold information about you in order to monitor and evaluate our Sports Development Programmes.

We use your data to improve the quality of our service and develop new services where required. We use the data to understand how and why our services are used and what difference they might make to Watford residents. Collecting data helps identify a need for the service to continue, we may use information gained from reports for marketing purposes.

#### **What data are we collecting?**

Processing of your personal data by Watford Borough Council (WBC) is necessary to run the Sports Development programmes. Without this information, the Service may not be able to report on the agreed measures on the progress of the Programmes. We may collect your name, address, email address and telephone number, Sometimes we collect other information you may feel is sensitive to you, this might include information about your disability, sexual orientation, sex, ethnicity or your exercise habits e.g. how active you are as well as your attendance records at our activity sessions.

For some sessions / events partners will collect data on behalf of WBC, therefore they are likely to be asking and receiving extensive information about those who take part in the activity. Partners will be responsible for the collection of this data and thus they need to provide details of their GDPR policy.

#### **Who will my information be shared with?**

Your information is shared to us by a third party e.g. instructor / coach. WBC or the instructor will then anonymise some personal data you provide to them which will ensure that you cannot be identified when passing information onto partners. We will sometimes need to share information between Council departments and services as well as other organisations such as our partners, whom can be seen listed below.

- Everyone Active
- Watford Community Trust
- YMCA
- Herts Sports Partnership
- Sport England
- Local schools
- Local sports clubs and coaches
- Mums of Steel
- ABC skateboarding
- Watford and Three Rivers School Sports Partnership
- Watford and Hertsmere School Sports Partnership
- Public Health
- CCG
- GP's
- Hertfordshire County Council
- Watford Cycle Hub
- Youth Connexions
- British Cycling
- Parkrun
- Saracens
- West Herts College

### **How long will you keep this information for?**

We will only keep your information for the minimum period necessary. The information outlined in this privacy notice will be kept after all action on your claim has finished and the period required by the council for legal and audit purposes has passed. All information will be held securely and destroyed under confidential conditions. A copy of this Council's retention policy is available [here](#).

### **How will my information be stored?**

Information will be stored electronically on a secure network and/ or securely in paper form. WBC will ensure, through a signed service level agreement, our partners are gathering, processing, storing and deleting your personal information.

### **Photo/video consent?**

#### **Photos of specific individuals/groups**

Where an image is clearly of an individual or group of individuals, who are the focus of the image, it will be personal data, and consent is required to use it. Although the Data Protection Act does not specify that consent should be in written form it however will always obtain written consent so that we have a record, in case of subsequent disputes.

Our Consent forms will explain clearly and fully how the image will be used and how long it will be retained e.g.

### **Third party photo/video consent?**

WBC are often partnering with other organisations, therefore the partners GDPR policy needs to present when collecting photo/video consent when the partner is responsible for the delivery of the session. Anyone delivering a session on behalf of WBC must adhere to GDPR guidelines set out in this document, or their own policy if they are solely responsible for the taking and marketing of a photo/video.

### **Photos where individuals inadvertently appear in the background**

It will not normally be necessary to obtain the specific permission of all who appear incidentally in the background of publicity shots where they are clearly not the focus of the image.

### **Photos of large crowds/events**

Where an image does not focus on one individual or group of individuals, the data is unlikely to be personal data. In addition, it may not be practicable to obtain the consent of every individual. However, as a good practice we will ensure that there are clear signs around the venue indicating that publicity photos are being taken.

### **Publication on web**

Publishing an image on the web is a potential disclosure to the world at large. We will take particular to obtain appropriate consent where the image constitutes personal data. In cases of doubt we will err on the side of caution and not publish the image.

### **Children**

We will not process any data relating to a child (under 13) without the express parental/ guardian consent of the child concerned.

We sometimes take photographs or video footage for publicity purposes. These images may appear in our printed publications, on our website, or both. We may also send them to the news media, which may use them in printed publications, and/or on their websites, and store them in their archives. They may also syndicate the photos to other media for possible use, either in printed publications, or on websites, or both. We will take all reasonable measures to ensure the images are used solely for the purposes for which they are intended. We will require consent from every participant taking part in the photos/videos.

For marketing and reporting purposes we may also share photos and / or videos that have been taken at our sessions and events, these may be shared through the following channels, only where consent is given.

- Watford observer
- My magazines
- Watford Borough Councils communication team
- About Watford
- Social media pages (Watford Get Active and Watford Borough Council Facebook and Twitter)

- Magazine, leaflets, posters and banners distributed across Watford district
- Watford Get Active and Watford Borough Council websites

### **What rights do you have?**

Your duty to inform us of changes it is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Your rights in connection with personal information under certain circumstances, by law you have the right to:

- **Request access to your personal information** (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.  
You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal information, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer in writing.

### **What legal basis allows you to use my information?**

Your consent is required to process your data and you have the right to withdraw any part of your data at any time. To enquire about your data, ask questions about how we process it, or request removal of certain parts from our systems, you can email us on [caroline.roche@watford.gov.uk](mailto:caroline.roche@watford.gov.uk)

### **DATA PROTECTION OFFICER**

The Council’s Data Protection Officer (DPO) is responsible for overseeing compliance with this privacy notice. If you wish to contact Watford Borough Council’s Data controller regarding your personal data and any other concerns you may have regarding its processing you can do so by contacting our Data Protection Officer (see below for contact details)

Contact details of the Data Protection Officer:

Data Protection Officer (DPO)  
Legal Services, Resources  
Hertfordshire County Council  
County Hall, Pegs Lane, Hertford, SG13 8DE

Postal Point: CHO150

Email: [watfordDP@hertfordshire.gov.uk](mailto:watfordDP@hertfordshire.gov.uk)

Tel: 01992 588099

If you are unhappy with how the data controller has processed your data, or if you feel they have acted in a way that has breached your data protection rights you have the right to complain to the information commissioner's office

The Information Commissioner's Office,  
Wycliffe House, Water Lane,  
Wilmslow,  
Cheshire,  
SK9 5AF,  
Tel: 01625 545745

Or you can visit their website at [www.ico.org.uk](http://www.ico.org.uk)

### **Changes to this Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This Privacy was last updated in February 2019.