



Limitless Sports F.C – <u>INFO@LSMGMT.CO.UK</u> - @LIMITLESS\_SPORT4 – <u>WWW.LSMGMT.CO.UK</u>.

Limitless coaches are fully DBS checked, hold the relevant Football Association Coaching Certificates and are Emergency First Aid qualified. Insured by Sportsguard.

LSE, is a sports education company educating and activating children in schools and activity clubs throughout the UK. We deliver PE and sports programmes in schools across England.

LSE is committed to meeting the highest standards of data protection to provide the best service to our contacts. We will tell our contacts exactly how we will use and store their data, not use it for any purpose other than the ones we have consent for and take all reasonable steps to ensure their data is stored and transferred securely.

LSE is committed to respecting the personal data you supply us with. The details we store enable us to personalise the service we provide and, with your consent, to keep you updated with details of courses, camps and services that may be of interest to you.

You have the right to opt out of receiving promotions from us at any time. This can be done by emailing info@lsmgmt.co.uk.

If you think any information we hold about you is incorrect you should notify LSE at info@lsmgmt.co.uk

Any information which is wrong will be corrected within a month. LSE strives to protection the security of information which you have provided and will use all appropriate security measures to safeguard such data

We process all personal data, including that collected via this website in accordance with EU General Data Protection Regulation 2018 (GDPR), which governs data protection and user privacy standards throughout the European Union.

GDPR outlines how organisations must collect, handle and store personal information. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed to any unauthorised parties unlawfully. We must also ensure that your information is protected against accidental loss. Users who entrust their personal data to companies like LSE have the following rights under GDPR:

- The right to be forgotten (you can request for your data to be deleted)
- The right to see all the data we hold on you (by submitting a Subject Access Request)











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- The right to data portability (if you ask to see all your data, we'll give it to you in a commonly used format, like a pdf)
- The right to correct inaccurate information we hold on you
- The right to opt-out of marketing communications as easily as you opted in
- The right to restrict or object to processing (although we may still need to hold on to your data, for example to fulfil a contract)
- The right to complain (this would be to a supervisory authority responsible for data protection)

Given the stringent nature of this regulation, our processing will also be compliant with other international data protection and user privacy legislation. If you are unsure whether our processing meets your country's data protection and user privacy legislation, please contact us at info@lsmgmt.co.uk

When visiting www.limitless-sportseducation.co.uk, you will be asked to consent to our use of cookies. Cookies are simple text files that a site saves to your computer or mobile device using your website browser. Only that server will be able to retrieve or read the contents of that cookie and each cookie is unique to your web browser. Cookies are either set by the website you are visiting, in which case they are referred to as 'first-party cookies' or are 'third-party cookies' set by other websites and services that run content on the page you are viewing.

To make full use of the features on the msporti.co.uk site your computer or mobile device will need to accept cookies.

Don't worry – we don't use cookies to store sensitive information, such as your name, address or payment details. They simply allow us to provide you with personalised features to make your visit to our website as smooth and relevant to you as possible. This can include remembering that you've visited our website before to auto-fill forms or improving your user experience by letting you navigate between pages more quickly and easily.

We may process this data to analyse how customers use our website. The legal basis of this processing is the cookie consent visitors give when visiting the website. But some people dislike the idea of a website accessing and storing their data. And if that's the case, you can accept or decline cookies by modifying the settings in your











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browser at any time. The 'help' function within your browser should tell you how, as will the 'enabling/disabling cookies' page on this site. However, you may not be able to use all the interactive features of our site if the cookies are disabled.

As with most websites, we use Google Analytics to measure how visitors move through and engage with the website. We use this data to improve our services, for example by measuring which pages people visit before making a purchase and ensuring those pages are optimised to make relevant information easy to find. To opt out of google analytics please click

here: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>

Google Analytics records information such as your location, and the device, browser and operating system you are using to view the website ("**usage data**"). None of this information can be used to identify you. Google Analytics records - but does not grant us access - to your computer's IP address. For this reason, we treat Google as a third-party data processor

We use this data to improve our services, for example by measuring which pages people visit before making a purchase and ensuring those pages are optimised to make relevant information easy to find. The legal basis for this processing is the implied cookie consent you give us when you visit our website.

Disabling cookies on your internet browser will stop Google Analytics from tracking any aspect of your journey through our website.

• Contact forms and email links (SMTP, Hubspot encryption of this data)

Data provided via the forms on our Schools or online portal is securely held and stored solely by us on LSE owned servers –

Once you have opted in to receive marketing information from us, your data is securely encrypted and then securely transmitted to the HubSpot secure servers using PHP scripts.

We will keep your email address on both databases until either you specifically request removal from the list, which can be done by following an Unsubscribe link included in all our communications or requesting removal by email. Please note that you will need to email us using the email account you want to have removed from our records.

We may need to keep your contact information on file for non-marketing purposes (e.g. if it is part-way through a school term, and your child is in one our clubs until the end of the term. We need to keep your information in case we have to contact











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you for information purposes, such as cancellation due to adverse weather).

In these scenarios, we will retain the bare minimum of information (i.e. your email address) on a Suppressed list, to ensure we do not contact you again once you have opted out or been removed from our email lists.

## What information we will hold on you

When you sign your child up for a LSE course, we collect the following information from you: name, relation to child, email address, phone number, home address, and payment details

#### How we will use it

We collect parent's names, email addresses, phone numbers, home addresses, and financial info for billing purposes, and to send you information relating to your booking (e.g. if your child needs to bring a certain item of clothing, or if there has been a change of timing or location).

If you opt-in to receiving emails, we send a parent's information letter once a term, as well as occasional marketing emails filled with content we think you'll be interested in.

## Our justification for holding this data

We have a contractual need to keep information relating to billing, and we have informed consent from you to send you marketing information. We may also need to get in touch with you in the event of an emergency relating to your child.

### With whom we may share your data

We will only share your information with those parties who may need to see this, for example members of staff to process your child's membership. Some of our technical support processors may also see sight of your information, and you can read more in Section 5 about where your data is stored in relation to servers, and web-based marketing systems we use to deliver emails.

# How long we'll keep your data

We reserve the right to delete customer's marketing data from our system if you no longer fulfil our sales criteria - i.e. if you have not made a purchase from us for the past two years, have not opened the last 11 of our emails, or if the children you are booking courses for are now older than the age range we deliver to (4-12 years old).

In these scenarios, we will retain the bare minimum of information (i.e. your email address) on a Suppressed list held within Hubspot, to ensure we do not contact you again once you have been removed from our email lists.











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Customers will be emailed every 12 months to check their communication preferences are up to date. This will be handled by a Hubspot workflow based on the date the customer's account was created.

Information about where a contact has come from, what their email preferences are and when this information was given will all be stored within the user's record in Hubspot.

If parents want to withdraw consent for marketing, they can update their communication preferences by emailing info@lsmgmt.co.uk

Children's Data

### What information we will hold on your child

When you sign your child up for a LSE course, we collect the following information from you about your child: name, DOB, gender, school, a record of their performance in LSE courses and medical information. During LSE courses, we will also need to record attendance.

#### How we will use it

We collect names, DOBs, gender, school name and a record of their attainment against National Curriculum standards on LSE programmes for monitoring and reporting purposes. This means we can see how many children we have activated, in which regions, and what the overall impact on their attainment and health has been.

We have a safety need to record your child's attendance in our courses by taking registers, and keeping a record of their medical information in case of an emergency during a LSE session.

### Our justification for holding this data

We ask for your consent when you sign your child up to a LSE course to hold their name, DOB, gender, school name and a record of their performance on LSE courses and also their medical history.

We also have a contractual need to hold some of this information, like their name, school name and attainment. Keeping a record of their attendance and medical information is known as a 'vital interest' justification, as we need to know this to safeguard your child and is also required to comply with our legal obligations.

Who we share your data with











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See Section 5 for information about where your data is stored in relation to servers, and web-based marketing systems we use to deliver emails.

## How long we'll keep your data

We will retain data during the life of the relationship with the customer and then for three years thereafter. Data referring to your child will be stripped back to non-data subject level (i.e. anonymised so it can't be linked back to you or your child) for the purpose of impact reporting.

School's data

#### What information we will hold on schools

We hold email addresses of teachers and headteachers (both named and generic addresses), the postal address & telephone number of school.

In some cases, we hold a record of pupil's attainment against National Curriculum standards on LSE programmes for monitoring and reporting purposes. This means we can see how many children we have activated, in which regions, and what the overall impact on their attainment and health has been.

#### How we will use it

We hold contact information (email addresses, postal addresses and phone numbers) for billing purposes.

We also retain email addresses in order to contact schools with marketing information with think will be of interest to them.

We have a contractual need to hold records of pupil's attainment against National Curriculum standards and provide this to schools for reporting purposes.

## Our justification for holding this data

We have a contractual need to retain email addresses, postal addresses and phone numbers in order to contact schools for billing purposes.

We have a legitimate interest to contact schools who have not yet started working with LSE.

#### Who we share your data with

See Section 5 for information about where your data is stored in relation to servers, and web-based marketing systems we use to deliver emails and across group.

### How long we'll keep your data

We have the right to retain data which is in the public domain, including school names, addresses, phone numbers and generic email addresses.











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We will retain pupil data for the lifetime of the school's contract with us. If a school ends their contract with us, we will delete all pupil data for that school three months after the end of the current academic year.

If you create an account through our website, your information is stored in our bespoke Business Management System, which has its own secure server (see section 6).

If you opt in to marketing communications, your data will be transferred to Hubspot, a third-party data processor. There, the data is stored on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure.

We reserve the right to delete your data from our system if you no longer fulfil our sales criteria - i.e. you have not made a purchase from us for the past two years, you have not opened the last 11 of our emails, or if the children you are booking courses for are now older than the range we deliver to (4-12 years old).

In these scenarios, we will retain the bare minimum of information (i.e. your email address) on a Suppressed list, to ensure we do not contact you again once you have been removed from our email lists.

We are based in the UK, and under GDPR, we can transfer data between countries which adhere to similarly stringent data protection legislation. This includes the USA, where some of Hubspot's servers are based. See section 7 for Hubspot's Privacy Policy.

Where we use data processors outside of the EU we will only use those who can guarantee the safety of your information. We will transfer your information to our processors using our legitimate business interests.

Our server, which we manage ourselves, is hosted in the UK with a company called Bayhill.co.uk. The server Operating System is kept up to date via automatic security patches and all software used is still supported (including PHP).

All our sites use HTTPS encryption to protect any sensitive data in transit from the server to the browser.

In the event of an unlawful data breach of this website, we will inform the Information Commissioner's Officer within 72 hours of the breach, if the fundamental rights and freedoms of those individuals whose data has been compromised is at risk. We will inform the people whose data has been compromised of the breach if the data compromised could have a significant











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negative impact on the individuals concerned (e.g. if it affects their financial or medical data).

The data controller of this website is **LSE**, Company Number **12377960** Registered address & operating office:

LSE LTD Company Number 12377960 3 North London Business Park, Oakleigh Road South, London, England, N11 1GN

Nana K A Asamoah LSE Director Tel: 07957993402 / Email: info@lsmgmt.co.uk

Our Data Protection Officer's contact information is:

Nana K A Asamoah

Tel: 07957993402 / Email: info@lsmgmt.co.uk

If you need to contact the ICO to report any issues with the way we have handled your personal data, you contact them through the following channels:

Call the helpline: 0303 123 1113 Visit their website: https://ico.org.uk/

Start a live chat with them: <a href="https://ico.org.uk/global/contact-us/live-chat/">https://ico.org.uk/global/contact-us/live-chat/</a>

• What will happen to your data in the result of an acquisition?

In the event of a takeover or acquisition, the personal data we hold will form part of the assets of the organisation and be taken over by the new company, but only used for the same or similar purpose. In these circumstances, we will write to everyone we hold data on and notify them about the change of ownership. We will continue to review and update this policy in line with the latest industry guidance. Any changes will be recorded in this section.





