



# **QTV Sports Privacy Policy**

## **Client and Supplier Databases**

Policy prepared by:	Marit Behner
Approved by board / management:	Jack McGill
Policy became operational on:	24/05/2018
Next review date:	24/05/2019

## **Introduction**

QTV Sports needs to gather and use certain information about individuals.

These can include customers, suppliers, contractors, employees and other people with whom the organisation has a relationship, or who we may need to contact.

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.

Data Protection is the responsibility of every individual at the company and this data protection policy will apply to every employee and director.

### **1. What is data?**

Under the General Data Protection Regulations (GDPR), data will refer to "any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier."

QTV Sports commits to

- Processing all data fairly and transparently
- Holding all data in a secure location
- Collecting and holding data only for the reasons and durations specified on collection
- Collecting only data which is necessary to its working processes

QTV Sports undertakes that every individual to whom the General Data Protection Regulation applies, and about whom we collect data about will have the following rights:

- The right to be informed – that is an obligation on us to inform you how we use your personal data (all set out in this Privacy Policy);
- The right of access – that's a right to make what is known as a 'data subject access request' for copy of the personal data we hold about you;
- The right to rectification – that is a right to make us correct personal data about you that may be incomplete or inaccurate;
- The right to erasure – that is also known as the 'right to be forgotten' where in certain circumstances you can ask us to delete the personal data we have about you (unless there's an overriding legal reason we need to keep it);
- The right to restrict processing – that is a right for you in certain circumstances to ask us to suspend processing personal data;

- The right to data portability – that’s a right for you to ask us for a copy of your personal data in a common format (for example, a .csv file); and
- The right to object – that is a right for you to object to us processing your personal data (for example, if you object to us processing your data for direct marketing).

These rights are subject to certain rules around when you can exercise them. You can see a lot more information on them, if you are interested, on the UK Information Commissioner’s Office website. [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise any of the rights set out above, please contact us via email at [hello@qtvsports.com](mailto:hello@qtvsports.com).

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We try to respond to all legitimate requests within one month. If longer, we will notify you and keep you updated.

You have the right to make a complaint at any time to the Information Commissioner's Office (“ICO”), the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

## **2. Why are we gathering data?**

QTV Sports collects and keeps records of people and organisations who have in the past worked with QTV or have submitted their details in order to be informed about the work of QTV Sports. The purpose for the data held is to keep customers, contractors and relevant third parties informed of opportunities with QTV Sports, changes to our service offer, or news regarding the the company's projects or achievements.

The data we may collect includes:

- Identity Data - this includes title, first name, last name, job title, company name or similar identifier. If you interact with us through social media, this may include your social media username.

- Contact Data - this includes billing address, delivery address, email address and telephone numbers.

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

QTV Sports may share your information with relevant third parties, where it is necessary for the execution of our contractual obligations, for example the inclusion of contact details on a Call Sheet or Health and Safety paperwork.

QTV Sports will never share your information with any other third parties without your prior written consent.

### **3. How are we collecting data about you?**

We use different methods to collect data from and about you.

You may give us your data by filling in forms or by corresponding with us face-to-face, by post, phone, email, business cards or through chat or social media.

This includes personal data you provide when you: sign up to receive our Newsletter; make enquiries or request information be sent to you; order our services; ask for information to be sent to you; engage with us on social media; enter a competition, promotion or survey; contact us directly; or leave comments or reviews on our services.

### **4. How will we use the data we collect about you?**

We will only use your personal data on the lawful basis of you consent or contractual agreement.

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you. For example, when you purchase or agree to supply services.
- Where we need to comply with a legal or regulatory obligation. For example, keeping records of our sales for tax compliance.
- We may contact you by email, phone, text or post to tell you about something that might be relevant to you and your business. If you no longer wish to be contacted by us, you opt-out at any time using the unsubscribe link in our emails, or writing to us on [hello@qtvsports.com](mailto:hello@qtvsports.com).

We would like to use the data we collect to contact you via

- Email
- Phone call
- Post

- SMS/ text messaging

#### **5. How long will the data be kept?**

QTV Sports will keep the data for at least one year, unless otherwise instructed. After one year data might be removed, or individuals may be asked if they wish to remain registered on the database. If we are maintaining an active relationship with an individual or organisation, we may retain their data for longer, without renewed consent.

#### **6. Where will the data be stored?**

The data collected will be stored in a secure digital location and will only be accessed by authorised QTV Sports staff.

#### **7. How will we enable individuals to make corrections? How will we differentiate what data we hold?**

Initially data will be collected by asking individuals to provide data about themselves. Any omissions will be treated as data they have not consented to collection.

If the data we hold about an individual is incomplete or incorrect, we will be able to complete the details by editing their entry if they wish to provide this data.

Similarly, we will be able to delete entries from the database on request of an individual instantly.

#### **8. How will we document any data processing?**

If we supply data to any third parties, we will keep a record of all communications with these third parties through our Email Archive.

#### **9. How will we deal with any breaches in our data protection?**

If we notice a data breach which may have led to a leak of sensitive personal information we will report it using the appropriate channels advised by Information Commission Office.