SALE SHARKS GDPR POLICY

This policy applies to:

All employees, workers, volunteers, contractors, consultants, and third parties who process personal data on behalf of Sale Sharks

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1. Policy Statement

Sale Sharks is committed to protecting the privacy, confidentiality, and security of personal information relating to our employees, supporters, season ticket holders, members, customers, suppliers, and business partners.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and all applicable data protection legislation. We are committed to ensuring that personal data is handled lawfully, fairly, transparently, and securely.

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2. Purpose

The purpose of this policy is to:

- Ensure compliance with UK GDPR and data protection legislation.
- Protect the rights and freedoms of individuals whose data we process.
- Explain how personal information is collected, used, stored, and protected.
- Define employee responsibilities when handling personal data.
- Promote a culture of data protection and information security throughout Sale Sharks.

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3. Scope

This policy applies to all personal data processed by Sale Sharks, including information relating to:

- Employees and job applicants.
- Supporters and season ticket holders.
- Members and customers.

- Volunteers and contractors.
- Suppliers and business contacts.

The policy applies to personal data held electronically, on paper, in photographs, recordings, and any other format.

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4. Data Protection Principles

Sale Sharks will ensure that personal data is:

Lawful, Fair and Transparent

Processed only where there is a lawful basis and individuals are informed about how their data is used.

Purpose Limitation

Collected only for specified, legitimate business purposes and not used in ways that are incompatible with those purposes.

Data Minimisation

Limited to the information necessary to fulfil business requirements.

Accuracy

Kept accurate and up to date wherever possible.

Storage Limitation

Retained only for as long as necessary to meet business, legal, or regulatory obligations.

Integrity and Confidentiality

Protected against unauthorised access, disclosure, alteration, loss, or destruction through appropriate security measures.

Accountability

Managed in a way that demonstrates compliance with data protection legislation.

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5. Personal Information We May Process

Employee Information

Sale Sharks may process:

- Name and contact details.
- Date of birth.
- National Insurance number.
- Payroll and banking information.
- Employment records.
- Emergency contact details.
- Training and performance records.
- Health information where necessary for employment obligations.

Supporter and Customer Information

Sale Sharks may process:

- Name and contact details.
- Membership and season ticket details.
- Ticket purchase history.
- Payment information.
- Marketing preferences.
- Customer service records.
- Event attendance information.

We will only collect information that is relevant and necessary for legitimate business purposes.

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6. Lawful Bases for Processing

Sale Sharks will only process personal data where there is a lawful basis, including:

- Performance of a contract.
- Compliance with legal obligations.
- Legitimate business interests.
- Consent where required.

- Protection of vital interests.
- Employment law requirements.

Where consent is relied upon, individuals may withdraw their consent at any time.

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7. How We Use Personal Data

Personal data may be used for:

Employment Purposes

- Recruitment and onboarding.
- Payroll administration.
- Pension and benefits administration.
- Workforce management.
- Training and development.
- Health and safety compliance.
- Performance and disciplinary management.

Supporter and Customer Purposes

- Managing memberships and season tickets.
- Selling tickets and merchandise.
- Processing payments.
- Providing customer services.
- Communicating club news and updates.
- Marketing activities where legally permitted.
- Improving supporter engagement and club services.

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8. Data Sharing

Sale Sharks may share personal data where necessary with:

- Government departments and regulatory authorities.
- HM Revenue & Customs (HMRC).

- Pension and payroll providers.
- Professional advisers.
- Ticketing and technology providers.
- Governing bodies and sporting organisations.
- Law enforcement agencies where legally required.

Any third party processing personal information on behalf of Sale Sharks must maintain appropriate security and confidentiality standards.

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9. Data Security

Sale Sharks takes appropriate technical and organisational measures to protect personal data, including:

- Secure IT systems and networks.
- Password-protected devices and accounts.
- Multi-factor authentication where available.
- Encryption of sensitive information.
- Controlled access to systems and records.
- Secure storage of paper records.
- Secure destruction of confidential documents.
- Staff training and awareness programmes.

All employees are responsible for protecting the information they handle and reporting any security concerns immediately.

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10. Data Retention

Personal information will only be retained for as long as necessary to fulfil the purpose for which it was collected and to meet legal, regulatory, financial, or operational requirements.

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

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11. Individual Rights

Under UK GDPR, individuals have the right to:

- Be informed about the use of their personal data.
- Request access to their personal information.
- Request correction of inaccurate or incomplete information.
- Request erasure of personal data where applicable.
- Request restriction of processing.
- Object to processing in certain circumstances.
- Request the transfer of personal data to another organisation.
- Withdraw consent where consent is the lawful basis.
- Lodge a complaint with the Information Commissioner's Office (ICO).

Requests relating to these rights should be submitted to the Data Protection Officer or the relevant department responsible for data protection.

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12. Employee Responsibilities

All employees, volunteers, and contractors must:

- Handle personal information securely and confidentially.
- Access personal data only when authorised and required for their role.
- Follow all Sale Sharks data protection procedures.
- Report suspected data breaches immediately.
- Complete mandatory data protection training.
- Protect passwords and system access credentials.

Failure to comply with this policy may result in disciplinary action.

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13. International Transfers

Where personal data is transferred outside the United Kingdom, Sale Sharks will ensure appropriate safeguards are in place and that such transfers comply with applicable data protection legislation.

14. Data Protection Officer

Sale Sharks will appoint an appropriate individual or team responsible for overseeing compliance with data protection legislation, responding to data subject requests, and advising on privacy matters.

All data protection enquiries should be directed through the designated, responsible manager.

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15. Monitoring and Review

Sale Sharks will review this policy annually or sooner if:

- Legislation changes.
- Regulatory guidance changes.
- Significant operational changes occur.
- A data protection incident identifies a need for improvement.

Policy Approval

Policy Owner: Chief Executive Office/Head of People & Change/Governance Manager

Approved By: Board of Directors

Effective Date: 1st August 2026

Review Date: 31st July 2028

Sale Sharks is committed to ensuring that personal information relating to staff, supporters, and customers is handled responsibly, securely, and in accordance with UK data protection law.