

INCLUSIVE SPORTSWEAR CIC - PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to let you know how we primes to look after your personal information.

We promise:

- To keep your data safe and secure
- Not to sell your data
- To enable you to update/amend your marketing preferences.

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services you may request from us. This also includes the safe delivery of any events you may attend or just managing our relationship with you.

This privacy notice sets out how we will look after your personal data when we hold or use it as a data controller, in compliance with the [Data Protection Act 2018](#) (“**DPA**”), the “[UK GDPR](#)” as defined in the DPA (“**GDPR**”) and all relevant UK data protection legislation. In particular, it sets out in detail:

- what information we hold about you (such as your contact details, address, etc.)
- how your personal information may be used and the reasons for these uses
- details of your rights.

Where we collect personal information from you directly, we will provide this privacy notice at the time we collect the information from you. We may do so by giving you this privacy notice or by providing a link to it on our website. Where we receive your personal information indirectly, we will provide this privacy notice when we first contact you, first pass the data to someone else or within a month, whichever is the earlier. If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us.

We will only provide this privacy notice to you once, generally at the start of our relationship with you. However, if the applicable privacy notice is updated substantially, then we may provide you with details of the updated version. In any event, you are encouraged to check back regularly on our website (“**Community Platform**”) for updates at www.inclusivesportswear.com

WHO WE ARE

References to **we**, **our** or **us** in this privacy notice are to the entity or entities in our group that act as a data controller for your personal data. Our group organisations are:

- Inclusive Sportswear CIC incorporated and registered in England and Wales with a community interest company number 14772836, whose office is at 26 Sedley Taylor Road, Cambridge, CB2 8PN.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Head of Operations is our Data Protection Lead and has overall responsibility for data protection compliance across the group.

Contact details are set out in the "**Contacting Us**" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you have an interaction with us, specifically on the Community Platform, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allow us to contact you directly, such as name, title, job role, and email addresses
- your organisation details, such as a school, company or other organisation type;
- use of and movements through our online systems, passwords, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events (including conferences, training courses, workshops, camps) or participation in any programmes or interventions associated with us;
- images in video and/or photographic form; and
- your marketing preferences so that we know whether and how we should contact you.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "**special categories**" of more sensitive personal information:

- your race or ethnicity, religious beliefs, sexual orientation and gender identity;
- information about your health, including any disabilities, medical conditions and history, injuries, allergies, medication, immunisations and health professional information; and

- access requirements.

In relation to the special category personal data that we do process we do so on the basis that:

- you have given explicit consent (e.g. by providing that information to us);
- the processing is necessary for reasons of substantial public interest – equality of opportunity or treatment;
- the processing is necessary for the establishment, exercise or defence of legal claims;
- the processing is necessary for the provision of health care or treatment; or
- the processing is necessary for scientific research or statistical purposes in the public interest.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you: create an account on our Community Platform at www.platform.inclusivesportswear.com ; sign-up to contact us on www.inclusivesportswear.com ; undertake any work for us; make a query and/or complaint; or when you correspond with us by phone, e-mail or in some other way.

If you are the lead contact at one of a group of schools who are part of Inclusive Sportswear Community Platform, we may also collect personal information from your account, but only for research or contact purposes.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any affiliation(s) or account(s) you have with us, manage our relationship with you and deal with any support, service or product enquiries made by you.	All contact, organisation and affiliation details.	This is necessary to enable us to properly manage and administer your affiliations, contracts and/or accounts with us.

	Financial details, records of your interactions with us, and marketing preferences.	
To send you information which is included within being part of the Community Platform, including competitions and events, partner offers and discounts and any updates.	All contact, organisation and affiliation details.	This is necessary to enable us to properly manage and administer your contract(s) with us.
To arrange and manage any contracts for the provision of any products and/or services by us.	All contact, organisation and affiliation details. Financial details.	This is necessary to enable us to properly administer and perform any contract for the provision of products/services by us.
To arrange and manage any contracts for the provision of any products and/or services by you.	All contact and organisation details. Financial details. Professional details.	This is necessary to enable us to properly administer and manage any contract with you. We have a legitimate interest in ensuring you are competent to provide the products/services.
To administer and manage your attendance at events or participation in programmes/interventions.	Contact, organisation and affiliation details. Identity documents, professional details, specific details, contact details of others, travel information.	We have a legitimate interest in ensuring that we properly administer, manage and deliver our events and programmes/ interventions and discharge our duty of care obligations.

Purpose	Personal information used	Lawful basis
	Health and medical information. Dietary or access requirements.	We process special category personal data on the basis of explicit consent and/or it being necessary

To use information about your physical or mental health or disability status and your requirements, to ensure your health and safety when engaging with us.		for the (potential) provision of health care or treatment.
To conduct monitoring, research and evaluation of our work.	Contact, organisation and affiliation details. Records of your attendance/ participation. Specific details. Information about your race, ethnicity, religious beliefs, sexual orientation. Health and medical information.	We have a legitimate interest in doing so to ensure that we can monitor our reach, assess the impact of our work and inform the future development of programmes, interventions and events. We process special category personal data on the basis of explicit consent and/or for scientific research or statistical purposes in the public interest.
For the purposes of equal opportunities monitoring.	Name, title, date of birth, gender, information about your race, ethnicity, religious beliefs, sexual orientation, health and medical information.	We have a legitimate interest to promote an environment that is inclusive, fair and accessible. We process special category personal data on the basis of explicit consent and/or for reasons of substantial public interest – equality of opportunity or treatment.
To answer your queries or complaints.	Contact and organisation details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with the services we provide.
For the purposes of promoting and marketing our work. (Adults, 18 years of age and above)	Images in video and/or photographic form, and voice recordings.	We have a legitimate interest to promote and market our work, including through the use of images of individuals participating in our programmes or attending our events.

	However, you always have a choice and an opt-out process will be provided. For specific photo/video shoots we will obtain your consent.
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Purpose	Personal information used	Lawful basis
For the purposes of promoting and marketing our work. (Young people, under 18 years of age)	Images in video and/or photographic form, and voice recordings.	Where we have obtained parental consent to do so.
The security of our IT systems.	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To send you other marketing information we think you might find useful or which you have requested from us, including news and updates, funded opportunities (programmes and interventions), products and services (including events, affiliation and partner promotions), and fundraising opportunities.	All contact, organisation and affiliation details. Marketing preferences.	We believe that we can demonstrate that we have a legitimate interest to send you certain marketing information, however you are able to select your marketing preferences. You always have a choice and you may unsubscribe or change your preferences at any time through our online preference centre.
Retention of records.	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records to properly administer and manage our relationship with you and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for

	processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations.
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We will use your personal information as described in this privacy notice, but, for example, we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy to be contacted for these purposes.

For some of your personal information you will have a legal, contractual or other requirement or obligation to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly discharge our contractual obligations or comply with legal obligations. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to deliver our products or services to you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting Us**" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain services to you.

5. DIRECT MARKETING

Email marketing: Our communications are primarily for news and updates; education; products and services; and research and insight. On initial registration/sign-up to the Community Platform, you are given the opportunity to select which categories, if any, you would like to receive information about.

- I agree my data may be shared with third parties for research purposes.
- I agree to be contacted by Inclusive Sportswear for research purposes.

You can update your preferences at any time by using the link we will send you or by logging into our website and choosing “Update Preferences” in our portal. You can also change your preferences by clicking on the “Unsubscribe” link at the bottom of any email marketing communications that we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

Details of how we disclose your personal information are set out below, but generally it is where we need to do so in order to run our organisation or to deliver our goods, services, programmes and events to you. In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

We do not sell, trade or rent your personal information to others.

We may share personal information with the following parties:

- Any party approved by you.
- IT system providers
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security

We do not disclose personal information to anyone else except as set out above, without your explicit consent.

7. STORAGE AND TRANSFER OF YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect will be stored on servers located within the UK.

We do not routinely transfer personal information outside of the UK, but our website and online resources are accessible from outside of the UK.

In exceptional circumstances, we will only transfer your personal information outside of the UK:

- Where the transfer is to a place regarded by the UK as providing adequate protection for your personal information.
- Where we have put in place appropriate safeguards that have been adopted by the UK or a relevant data protection authority, equivalent to UK GDPR standards.

For further details please contact us by using the details set out in the "**Contacting Us**" section below.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you, however, we will only hold your information for as long as is necessary or where you ask us to delete records we may delete it earlier. In some cases, personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of up to seven years after your last contact with us. Exceptions to this rule are:

- All special category data will be deleted or irreversibly anonymised within three months of the date of the event or programme/intervention for which it was collected.
- Images (including any associated consents) will generally be retained for a period of up to 5 years after we have obtained them. Exceptions to this are for images that are identified as being of particular significance, where Inclusive Sportswear have established a legitimate interest to retain them for the purpose of ensuring we have an historical record of our work.
- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after your interaction with us.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address, by contacting us using the details set out in the "Contacting Us" section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;

- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the **"Contacting Us"** section 15 below. You can also unsubscribe from any direct marketing as set out in section 5 above.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to help and would encourage you to contact us to resolve your complaint first.

10. LINKING WITH THIRD PARTY SITES (relevant to users of our Community Platform only)

Our Community Platform may, from time to time, contain links to and from other websites associated with our work or the work of our partners. If you follow a link to any of these websites, please note that these websites have their own privacy policies, and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies, and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to our Community Platform from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

11. SECURITY

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

12. COOKIES (relevant to users of our site only)

Certain parts of our Website and Community Platform use "cookies" to keep track of your visit and to help you navigate between sections. A cookie is a small data file that certain websites store on your computer's hard drive when you visit such websites. Cookies can contain information such as your user ID and the pages you have visited. The only personal information a cookie contains is information that you have personally supplied.

We use cookies on our Community Platform to enable us to deliver content that is specific to your interests and gives us an idea of which parts of the Community Platform you are visiting and to recognise you when you return to the Community Platform. Reading cookies does not give us access to other information on your computer's hard-drive and our Site will not read cookies created by other websites that you have visited.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. If, however, you select this setting you may be unable to access certain parts of the Community Platform. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies when you access the Community Platform.

Please note providers of third-party content may also use cookies over which we have no control. For detailed information on the cookies we use and the purposes for which we use them see the table below.

Cookie	Purpose
_utma _utmb _utmc _utmz	Used throughout the site for Google Analytics. These cookies are used to collect information about how visitors use our site. We use the information to compile reports and to help us improve the site. The cookies collect information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from and the pages they visited.

	Click here for an overview of privacy at Google
cookie-agreed	This is set once the user has accepted the cookie policy popup notification.
has-js	This is set to store whether the user has the ability to run Javascript.
SSESSxxx	(where xxx is unique) this is the user's session id and is used to identify the user to the website.
UMB_UCONTENT_MEMBERS	Login cookie for front end.
_gat_gtag_UA_13105305_1	Tag Manager.
_gid & _ga	Google Analytics.

13. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. Any changes we may make to this privacy notice in the future will be posted on our Site and, where appropriate, notified to you by e-mail. When we change this privacy notice in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes and should you object to any alteration, please contact us as set out in the "**Contacting Us**" section below.

14. CONTACTING US

In the event of any query or complaint about the information we hold about you, please email community@inclusivesportswear.com

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