



DIRECTORATE:	LEGAL & GOVERNANCE - PEOPLE
HR STRATEGY ITEM:	Recruitment, interview and selection
DOCUMENT:	Privacy Policy
CREATED:	December 2023
REVIEW DATE:	November 2024

Introduction

Lincoln City Football Club Company Limited (“LCFC”) takes your privacy very seriously and is committed to protecting your personal data and handling it responsibly.

This privacy policy sets out how we use, look after and store the personal information collected from you.

LCFC is a data controller. This means that we are responsible for deciding how we hold, use and store personal information about you. We are required under the data protection laws to notify you of the information contained in this privacy policy.

We may update this at any time so please check back at any time to view any changes.

It is important that you read this policy, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using your personal information.

Data Protection Principles

We will comply with all relevant data protection law including the General Data Protection Regulation (GDPR). This requires that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way;
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only if necessary for the purposes we have told you about; and
- Kept securely.

What type of information we have

Personal data, or personal information, means any information about an individual from which that person can be identified, whether directly or indirectly. It does not include data where the identity has been removed (anonymous data).

There are also "special categories" of sensitive personal data which require a higher level of protection.

We take reasonable care to keep your personal information secure and to prevent any unauthorised access or use of it.

We may also ask for your relevant health information, which is classed as special category personal data, for the purposes of your health, wellbeing, welfare and safeguarding.

How we collect the information and why we have it

When you apply for a job with the Club, we will only use your personal data for the purpose for which it has been specifically provided. We have set out below a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Under the GDPR, the lawful bases we rely on for processing this information are as follows:

- (a) Your consent. You are able to remove your consent at any time. You can do this by sending an email to rpar@theredimps.com.



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(b) We have a legitimate interest. We process your personal data when necessary to pursue our legitimate interests in the following:

- Processing job applications;

You have a right to object to any processing that we undertake for our legitimate interests.

What we do with the information we have

We will only use your personal information when the law allows us to.

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

- Where we need to comply with a legal or regulatory obligation.
- We may need to process a job application or respond to an enquiry about a possible job with us.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

How we store your information

We have put in place appropriate technical and security measures to protect the security of your personal information. Details of these measures are available upon request. Third parties will only process your personal information on our written instructions and where they have agreed to treat the information confidentially and to keep it secure as part of their contractual arrangement with us.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, workers, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures are available upon request.

We have put in place technical and organisational processes and procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

How long your personal information is stored

We keep personal data for the duration of the application process and into your employment, if applicable. We will delete this data once your involvement with LCFC has ended or sooner if you have specifically requested this and we are able to do so. We may need to retain some personal data for up to 6 years from the initial interaction so that we can meet our legal, regulatory and contractual obligations. We will then delete your information.

Your data protection rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes at any point by emailing rpar@theredimps.com.



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Under data protection law, you have the following rights:

- Your right of access - You have the right to ask us for copies of 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;
- Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete;
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. 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);
- Your right to object to processing - You have the right to object to the processing of your personal data in certain circumstances;
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances. 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; or
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. If you make a request, we have one month to respond to you.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please email rpar@theredimps.com.

If you wish to submit a data subject access request, please email rpar@theredimps.com. We may need to request specific information. To ensure we are speaking to the correct person we will to of (certified copy of your passport, valid UK driving license or utility bill) from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Data Protection Officer (DPO)

We have appointed a data protection officer to oversee compliance with this privacy policy. If you have any questions about this privacy policy or how we handle your information, please contact our DPO by email on rpar@theredimps.com.

Changes to this Privacy Policy

We reserve the right to update this privacy policy at any time. We may also notify you in other ways from time to time about the processing of your personal information.

How to complain

If you wish to complain, please email our Data Protection Officer at rpar@theredimps.com or write to us at Lincoln City Football Club, LNER Stadium, Sincil Bank, Lincoln, LN5 8LD.

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data.



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The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113