

**Wycombe Wanderers Supporters Group Ltd (The Trust)**

**Privacy Statement**

1. **Introduction**

The General Data Protection Regulation (GDPR), requires the Trust to make public its’ approach to ensuring the privacy of individuals’ data. For the purpose of this Privacy Statement, the term “Trust” is used to cover Wycombe Wanderers Supporters Group Ltd and Frank Adams Legacy Ltd

1. **Consent**

The General Data Protection Regulation (GDPR) allows the use of Legitimate Interest Assessment (LIA) as a means of obtaining the consent of individuals whose data is held, in cases where the individual might reasonably expect such data to be held and where there is minimal impact on the individual’s privacy. The Trust will use LIA as a means of consent wherever appropriate and will seek opt-in consent where the above conditions do not apply.

1. **The Individual’s Rights Under GDPR**

The Trust, in complying with the principles of GDPR, will ensure that:

1. data, in respect of an individual, is held only when there is a lawful basis for doing so. A lawful basis will include, but may not be limited to a legal obligation, a contract or the protection of an individual’s vital interest.
2. every individual whose data is held by the Trust is entitled to request, and the Trust will provide, within one month of the request, a copy of the data held for that individual, with a clear explanation of the lawful basis for it being held. The Trust will promptly rectify such data, if requested. Such requests should be made by email to [secretary@wycombewandererstrust.com](mailto:secretary@wycombewandererstrust.com) or in writing to the Trust at Adams Park, Hillbottom Road, High Wycombe, Bucks, HP12 4HJ.
3. every individual has the right to request that his data be erased. The Trust may refuse to erase data where there is a legal reason for it being held and, in other circumstances, will advise of any disadvantage that might accrue to the individual by the erasure, before acting on the request.
4. it will advise of the right to object should data be used for Direct Marketing and shall immediately cease the processing of data for such purposes.
5. it will not use automated decision making or profiling in the processing of data.
6. data may be held on a secure drive with access limited to specific data owners in order to ensure appropriate security, or, in the case of membership data, is held by the Data Processor who has confirmed its commitment to GDPR compliance in its contract with the Trust.
7. it keeps its’ Privacy Statement under regular review and updates its’ websites accordingly
8. **Data Retention**

The Trust confirms that hard copy membership data is destroyed upon data being entered into its electronic database and that electronic data is erased upon termination of membership. 500 Club data will be erased 12 months after the termination of each 500 Club campaign. All other data will be retained for a minimum of 7 years.