

Data Protection Policy

Introduction

Sheffield International Venues vision is to embrace a direct marketing philosophy. The Company aim to maximise awareness of promotional offers, public relations and advertising initiatives via direct marketing systems that achieve maximum income for the Company

1 Purpose of Data Protection Act 1998 within SIV

To ensure that personal data about an individual is accurate, up to date and relevant; that it is held in a secure way; that it is used for the purpose (s) for which it was collected and that it is disclosed only to authorised persons in accordance with the clearly laid down statutory procedure.

2 Data Protection Principles

Sheffield International Venues Limited will provide training for all appropriate staff on their duties and responsibilities regarding the Act. The training programme will make staff fully aware of their obligations under the Act relating to the security, accessibility, accuracy and disclosure of personal data.

At all times the Company will adhere to the eight Data Protection Principles, as set out and interpreted in schedule 1 of the Data Protection Act 1998 or any modification / alteration of the same pursuant to the provisions of Section 2, quoted below:

1. Personal Data shall be processed fairly and lawfully and, in particular, shall not be processed unless:
 - a) at least one of the conditions in Schedule 2 is met, and
 - b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.

5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

3 Registration under the Data Protection Act 1998

- 3.1 All organisations that process relevant data must register with the Data Protection Commissioner to determine the type of data to be collated by the organisation and for what purpose.
- 3.1 The Marketing Analyst is responsible for ensuring that the registration is renewed and updated accordingly.
- 3.2 Sheffield International Venues have two Registrations covering:
 - 1) **Sheffield Arena** – for the purpose of:
 - a) Marketing & Selling
 - b) Reservations, bookings and ticket issue
 - c) Personnel information
 - 2) **Don Valley Stadium, Ponds Forge, Hillsborough Leisure Centre, Concord Sports Centre, City Hall, Golf Courses and Sheffield Arena** – for the purpose of:
 - a) Personnel / employee administration
 - b) Reservations, bookings and ticket issue
 - c) Purchase / supplier administration

4 Sheffield International Venues Data Bank

- 4.1 Sheffield International Venues Ltd maintains a record of all sets of data being held by the company.
- 4.2 Anybody proposing to collect new sets of data must first obtain approval from the Data Controller.
- 4.3 The Data Controller will periodically review the collection and storage of data to ensure that the Act is being complied with.
- 4.4 Internal Audit will also review controls surrounding the collection and use of data to ensure compliance with the Act.

5 Data Protection Principles and Procedures

5.1 Personal data shall be processed fairly and lawfully and in particular shall not be processed unless one of the following conditions is met:

- the data subject has given their consent
- the processing is necessary for the performance of a contract to which the data subject is party
- the processing is necessary to comply with any legal obligation
- all database use must be approved by the relevant authorised person within each department or venue (see item 3.2 in the Data Protection Procedure document)
- the processing is necessary in order to protect the vital interests of the data subject
- **Every** document that asks for personal information from an individual (i.e. contact details, gender, date of birth, financial details etc.) requires a disclaimer on the document that clarifies to the individual:
 - Where the information will be stored
 - What the information will be used for
 - Who will have access to the information
 - How the individual can expect to be contacted (i.e. by telephone, letter, email)

Therefore, all material must be approved and signed off by the Data Controller or Marketing Analyst before being sent to print.

5.2 Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or other purposes.

5.3 Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

5.4 Personal data shall be accurate and, where necessary, kept up to date.

Notification of the death of a data subject, change of address etc. must be dealt with promptly to maintain accurate and up to date information.

Individual sites create individual Data Amendment forms that are designed to tailor to the needs of the individual business and ensure the accurate and correct maintenance of customers and suppliers data.

All changes must be recorded on the various Data Amendment form and amendments to the database must be made as soon as possible. The Data Amendment form must then be signed to confirm that the records have been updated and filed and stored at the relevant site.

It is not necessary for archived records to be updated unless the data is intended for use at a later stage.

NB This procedure will vary, in terms of whether the data will be stored centrally or separately at each site.

5.5 Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

5.6 Personal data shall be processed in accordance with the rights if the data subjects under this Act.

5.7 Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

All data held must have a back up

All staff members who have any degree of access to the data stored on Microcache must respect the confidentiality of the information. To restrict access to this information, staff must only operate Microcache under their personal security password. If a member of staff needs to leave their system that is operating Microcache, it is essential that the staff member logs out of the system to minimise accessibility. Staffs will be subject to disciplinary action if this is not adhered to.

5.8 Data Protection Fees

There is a charge of £10 inclusive of VAT for each individual search.

Each venue is separately registered under the Data Protection Act.

Data is held independently at each site therefore separate payment is required.

5.9 New Sets of Personal Data

Any person within Sheffield International Venues who wishes to collect and store new data must first seek permission from the Data Controller.

Permission is sought via the completion of a Data Authorisation Request form (Appendix 1), which can be obtained from the Data Controller.

Departmental Managers must complete a Data Authorisation Request form and submit it to the Marketing Analyst at **least six weeks in advance** of collating the data.

This will enable the Data Controller to confirm with the Registrar that the personal data is being collated in accordance with Sheffield International Venues Limited registration.

The Data Controller or Marketing Analyst will provide written authorisation or rejection for each request accordingly, on receipt of conformation from the Registrar.

5.10 Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Any person within Sheffield International Venues who wishes to externally transfer any data that is controlled or owned by the company must first seek permission from the Data Controller.

Permission is sought via the completion of a Data Transfer Request form (Appendix 2), which can be obtained from the Data Controller.

Departmental Managers must complete a Data Transfer Request form and submit it to the Marketing Analyst.

This will enable the Data Controller to confirm with the Registrar that the transfer of data covered in accordance with Sheffield International Venues Limited registration.

The Data Controller or Marketing Analyst will provide written authorisation or rejection for each request accordingly, on receipt of conformation from the Registrar.

Sheffield International Venues Limited is **not** registered to sell data on to external organisations that are located outside of the European Economic Area. Therefore, it is essential that when data is sold on to organisations within this area, a Data Contract must be signed by the company that clearly states that, under no circumstances is the data to be transferred beyond what is clearly stated in the Contract.

6 Annual Checks

- 6.1 As part of the Internal Auditors ongoing work s/he will continuously check to ensure that individual venues and departments within Sheffield International Venues are complying with Sheffield International Venues Data Protection Policy and Data Protection Act 1998.

7 Guidance Notes

7.1 Excessive Information

In terms of data capture the Company will need to prove that we need the data for the purpose we have collected it for. Data is captured under the following headings:

Title	Email
Surname	D.O.B
Forename(s)	Occupation
Address	Ethnic Origin
City/Town	Leisure Interests
Postcode	Method of Marketing
Telephone	Data Protection Clause
Mobile	

7.2 Sensitive Information

Under the Act Sheffield International Venues deems any information other than name to be as sensitive.