



# Privacy Policy (GDPR)

*Policy Lead:* **Mr Arjun Purewal**

*Review Date:* **July 2025**

*Policy Lead Signature:*

A handwritten signature in black ink, appearing to read 'Arjun Purewal', is written over a horizontal line within the signature box.

## **AP Coaching Sunderland**

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### **INTRODUCTION**

As a matter of best practice, individuals working with AP Coaching and who have access to personal information, will be expected to read and comply with this policy. This policy will be updated as necessary to reflect best practice in data management, security and control and, to ensure compliance with any changes or amendments to GDPR and other relevant legislation.

The Code of Practice on GDPR gives further detailed guidance, which AP Coaching Sunderland undertakes to adopt and comply with this Code of Practice.

### **GENERAL DATA PROTECTION REGULATION (GDPR)**

This piece of legislation came into force on 25<sup>th</sup> May 2018. The GDPR regulates the processing of personal data and protects the rights and privacy of all living individuals (including children), for example, by giving all individuals who are the subject of personal data, a general right of access to the personal data which relates to them.

Individuals can exercise the right to gain access to their information by means of a 'subject action request'. Personal data is information relating to an individual and may be in hard or soft copy (paper files, electronic records, photographs or video) and may include facts or opinions about a person.

### **RESPONSIBILITIES**

Under GDPR, AP Coaching will be the 'data controller' under the terms of legislation. This means that ultimately, we are responsible for controlling the use and processing of the personal data. Compliance with the legislation is the personal responsibility of all members of the business who process personal information.

### **DATA PROTECTION PRINCIPLES**

The legislation places a responsibility on every data controller to process any personal data. In order to comply with its obligations, AP Coaching will:

- Process data fairly and lawfully.
- Make all reasonable efforts to inform data subjects that we are responsible for their data and the purposes of processing their data. We do not disclose your data to 3<sup>rd</sup> Parties.
- Give an indication as to the time period that data will be stored.
- Ensure that data is adequate, relevant and up to date.
- Only keep personal records for as long as is necessary.
- Undertake a regular review of all information we hold and securely dispose of any data we feel is no longer required or necessary.
- Put appropriate technical and organisational measures in place against unauthorised or unlawful processing of data, accidental loss or destruction of data.
- Keep hard copies of data in a lockable cabinet or safe with controlled access.
- Password protect any electronically-held data.
- Ensure that no data is transferred to a country or territory outside of the European Economic Area (EEA), 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.

## **CONSENT**

Although it is not always necessary to gain consent from individuals before processing their data, it is often the best way to ensure that data is collected and processed in an open and transparent manner.

We will only retain your data for as long as is required. You can submit a request to have your personal data removed via our website.

## **Procedure for Review**

AP Coaching Sunderland will review this policy annually. However, this policy will be updated as necessary to reflect best practice or future amendments made to the General Data Protection Regulation (GDPR)

This document will be fully reviewed in July 2025 unless any new significant legislation, guidance or new developments emerge.