

DATA OBJECTION POLICY

1. Purpose

1.1 This document sets out our policy for ensuring the right of individuals to object to how we process their personal data.

2. When do you have a right to object to the processing of your personal data?

2.1 Individuals have the right to object to:

- (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- (b) direct marketing (including profiling); and
- (c) processing for purposes of scientific/historical research and statistics.

3. How do you object to how we process your personal data?

3.1 A request can be made either verbally or in writing to the Trust. If made in writing, this should be sent to the Trust's Lead for Data Protection at:

Eastlands Trust
Head Office
National Squash Centre
Etihad Campus
Manchester
M11 3FF
dataprotection@eastlandstrust.org

3.2 If you want to make the request verbally, you can call us on 0161 974 7837 or you can speak to any of our Operations Managers at any of our sites in person.

3.3 We will make a record of your objection, whether we receive your request in writing or verbally. This helps us to monitor our performance and identify any service level issues. We will keep this record in accordance with our Data Retention Policy.

4. What do we do when we receive a request?

4.1 We will first check that we have enough information to be sure of your identity. Often we will have no reason to doubt a person's identity, for example, if we have regularly corresponded with you or if you are making the request in person. However, if we have good cause to doubt your identity we can ask you to provide any evidence we reasonably need to confirm your identity. For example, we may ask you for a piece of information held in your records that we would expect you to know, a witnessed copy of your signature, or proof of your address.

Eastlands Trust

Head Office: c/o National Squash Centre & Regional Arena,
Etihad Campus, Gate 13, Rowsley Street, Manchester M11 3FF

Company Registration no.: 03747112

- 4.2 We will check that we have enough information to find your records. If we feel we need more information, then we will promptly ask you for this.
- 4.3 Once any queries around the request have been resolved, we will take the necessary action to stop processing your personal data in the way in which you have requested, or to inform you of the lawful reason as to why we will not be doing so.
- 4.4 If we have disclosed the personal data to others, we will contact each recipient and inform them of the erasure, unless this proves impossible or involves disproportionate effort. We will also inform you about these recipients.
- 4.5 Users of our services should be aware that if we are stopped from being able to process your personal data in certain ways, you may no longer be able to use our services going forward.
- 4.6 We must stop processing your personal data after your request unless:
- (a) We can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
 - (b) The processing is for the establishment, exercise or defence of legal claims.
- 4.7 There are no exemptions or grounds to refuse a request to stop processing personal data for direct marketing purposes.

5. Will we charge a fee?

5.1 No.

6. What is the timeframe for responding to objections around the processing of personal data?

6.1 We must do this immediately.

7. Our complaints procedure

7.1 If you are not satisfied by our actions, you can seek recourse through our internal complaints procedure, the Information Commissioners Officer, or the courts.

7.2 Our Chief Operating Officer will deal with any written complaint about the way a request has been handled and about what information has been disclosed. The Chief Operating Officer can be contacted at:

Eastlands Trust
Head Office
National Squash Centre
Etihad Campus
Manchester
M11 3FF
Telephone: 0161 974 7837

Eastlands Trust

Head Office: c/o National Squash Centre & Regional Arena,
Etihad Campus, Gate 13, Rowsley Street, Manchester M11 3FF

Company Registration no.: 03747112

- 7.3 If you remain dissatisfied, you have the right to refer the matter to the Information Commissioner. The Information Commissioner can be contacted at:

Information Commissioner's Office Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 01625 545 745
Fax: 01625 524 510
Email: enquiries@ico.gsi.gov.uk

Next annual review date: 1st April 2019

Eastlands Trust

Head Office: c/o National Squash Centre & Regional Arena,
Etihad Campus, Gate 13, Rowsley Street, Manchester M11 3FF

Company Registration no.: 03747112