

## DATA RESTRICTION POLICY

### 1. Purpose

- 1.1 This document sets out our policy for ensuring the right of individuals to have personal data restricted or suppressed, is enacted. This means that you have a right to limit the way in which we use your data, and is an alternative to your right of erasure. This right of restriction is not absolute, and only applies in certain circumstances.
- 1.2 When processing is restricted, we have the right to store personal data, but not to use it.

### 2. When do you have a right to request that your personal data is erased?

2.1 You have the right to have your personal data restricted if:

- a) you contest the accuracy of your personal data and we are verifying the accuracy of the data;
- b) the data has been unlawfully processed (i.e. in breach of the lawfulness requirement of the first principle of the GDPR) and you oppose erasure and request restriction instead;
- c) we no longer need the personal data but you need us to keep it in order to establish, exercise or defend a legal claim; or
- d) you have objected to us processing your data under Article 21(1), and we are considering whether our legitimate grounds override yours.

2.2 In the case of 2.1(a) or 2.1(d) above, as a matter of good practice, we will automatically restrict the processing of your personal data whilst we are considering its accuracy or the legitimate grounds for processing the personal data in question.

2.3 In most cases, we will not be required to restrict an individual's personal data indefinitely, but will need to have the restriction in place for a certain period of time.

2.4 Once we have made a decision on the accuracy of the personal data, or that our legitimate grounds for processing it override your rights, we may decide to lift the restriction. If we do this, we will inform you before we lift the restriction.

### Eastlands Trust

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

Company Registration no.: 03747112

### 3. How do you make a request to have your personal data restricted?

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](mailto: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 request for restriction, 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.

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 restrict the processing of your personal data.

4.4 Whilst your data is restricted, we will not process it in any way **except to store it** unless:

- a) we have your consent;
- b) it is for the establishment, exercise or defence of legal claims;
- c) it is for the protection of the rights of another person (natural or legal);  
or
- d) it is for reasons of important public interest.

4.5 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.

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4.6 Users of our services should be aware that if we restrict your personal data, you will no longer be able to use our services unless/until we are able to un-restrict your personal data.

## **5. Will we charge a fee?**

5.1 In most cases, no, although please see paragraph 7 below.

## **6. What is the timeframe for responding to requests to restrict your personal data?**

6.1 We have one calendar month starting from the day after we have received all the information necessary to identify you, to respond to your request. In many cases, it will be possible to respond in advance of the one month target, and we will aim to do so where possible.

## **7. Are there any grounds we can rely on for not complying with a request to restrict your personal data?**

7.1 We can refuse to comply with a request for restriction if the request is manifestly unfounded or excessive, taking into account whether the request is repetitive in nature.

7.2 If we consider that a request is manifestly unfounded or excessive, we can either request a 'reasonable fee' to deal with the request, or we can refuse to deal with the request.

## **8. Our complaints procedure**

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

8.2 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

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- 8.3 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](mailto:enquiries@ico.gsi.gov.uk)

*Next annual review date: 1<sup>st</sup> April 2019*

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