PRIVACY NOTICE

Last reviewed: September 2026

CONTENTS

1. Introduction 2
2. Who We Are 2
3. What Information We Collect 2
4. Why We Process Your Information and Our Lawful Basis 4
5. How We Collect Your Information 6
6. Who We Share Information With 6
7. Transfers of Your Information Outside the UK 8
8. How Long We Keep Information and How We Keep It Secure 8
9. Employee Rights 10
10. Complaints and Data Breach Procedures 10
11. Changes To This Notice 11
12. How to Contact Us 11
Document Control 11

1. Introduction

Living Better is committed to protecting the privacy and security of your personal information. We are committed to being transparent about how we handle your personal data.

This Privacy Notice explains how we collect, use, store and share personal information about you when you use or interact with our website (www.living-better.org.uk) or the services we provide (including but not limited to our service provision or project delivery) in accordance with UK GDPR Articles 12, 13 and 14 and the Data Protection Act 2018. This policy also informs you of your rights in relation to accessing or updating your data and whether your data is shared with third parties.

2. Who We Are

Living Better is the data controller for the personal information we hold about you. This means we decide how and why your personal data is processed.

Our registered name is Living Sport Cambridgeshire and Peterborough Sports Partnership Limited (trading as Living Better), charity number 1124122. Our contact details, and those of our data protection lead, are set out in Section 12.

3. What Information We Collect

The information we collect will vary depending on the service, project, programme, activity or event you are involved in or access or any other engagement you have with us. We will only collect information that is relevant, adequate and necessary for the purposes set out in this Privacy Notice. Therefore, not all categories of information listed below will apply to every individual.

Basic Personal Information

We may collect and process information that helps us identify and contact you, including:

- **Your contact details**: name, date of birth, home address, telephone number, email address, emergency contact details, and unique reference numbers or identifiers where applicable.
- **Your child's details**: only through a parent or guardian providing these details; they cannot provide them their selves. As a parent or guardian, you have to give permission for your child(ren) to take part in relevant activities we provide.

Participation and Service Information

Where you access our services, programmes, projects or events, we may collect information relating to your involvement, including:

- **Attendance information**: registration and enrolment information, attendance records.
- **Referral information**: records of support, advice or services provided.

- **Participation information**: information relating to your goals, outcomes and progress.
- **Feedback**: information that will help us improve services e.g. feedback, surveys and evaluation information.
- **Recorded visual and aural images**: including but not limited to photos, videos and voice notes to support reporting to funders and use for marketing and promotional purposes including but not limited to being shared on our website, being shared across our social media channels, in our newsletter, used for wider marketing purposes and used in case studies.
- **Marketing preferences**: records of consent.
- **Training/event participation details**: job role, organisation name, work email address and work phone number if signing up to training we provide or working with us at an event.

Special Category Data

Where necessary, we process data which UK GDPR treats as more sensitive. We only collect and use this information where we have identified an appropriate lawful basis, as set out in Section 4 below. Where we process special category personal data, we do so only where permitted by Article 9 of the UK GDPR and, where required, Schedule 1 of the Data Protection Act 2018.

- **Health and Wellbeing information**: For some programmes, activities and services, we may need to collect information about your health and wellbeing to support your participation safely and appropriately. In some cases, you cannot participate unless we have these details. This may include: relevant medical conditions, disabilities or accessibility requirements, mobility information, physical activity readiness information, health questionnaires, dietary information, care and support needs, information provided by healthcare professionals or referral partners where appropriate.
- **Equality, Diversity and Inclusion information**: We may ask for information that helps us understand whether our services and recruitment processes are reaching the different communities we serve and whether there are any barriers to access. This may include: age, disability, ethnicity, religion or belief, sex, gender identity or any other equality monitoring information that you choose to provide. This is provided by you on a voluntary basis unless we explain otherwise.

Financial Information

Where necessary, we may collect financial information, including:

- **Financial information**: bank account details and funding or grant-related information.
- **Payment details**: payment records and expenses claims, including donation records, but Living Better do *not* store your card details when you make a payment. Payment data is processed by STRIPE in their role as a processor. Data may be transferred to the US under appropriate safeguards.

Communications Information

Where necessary, we may keep records of communications with you, including:

- **Correspondence information**: emails, letters, telephone calls, prize draw entrance, enquiries, complaints, compliments and requests for information.

Technical and online information

When you use our website, online forms (including but not limited to booking onto an event through our website) or digital services (including but not limited to subscribing to our newsletter), we may collect:

- **Website-related information**: IP address, browser type and device information, website usage information through Google Analytics or other tool, cookie-related information (you will be asked to consent to our use of cookies when you first visit our website), account or login information where applicable.

Information when applying to work with us

If you apply to work or volunteer with us, or act as a trustee, we may collect:

- **Application information**: application information, employment history and qualifications, training records, references, right to work information
- **Recruitment information**: DBS or safeguarding information where required; payroll, pension and payment information where applicable

If successful, **further information is included in our Employee and Volunteer Privacy Notice**.

Safeguarding, welfare and incident information (where concerns arise)

Living Better is committed to safeguarding children, young people and adults at risk. In the normal course of delivering our services, projects, programmes and events, we do not routinely collect safeguarding information. However, where a safeguarding, welfare or safety concern is raised, we may use or collect information relating to the concern, any investigation undertaken, decisions made and actions taken to protect individuals. This data will be stored securely on our safeguarding platform.

4. Why We Process Your Information and Our Lawful Basis

The lawful basis we use will depend on the programme, project or service being delivered. For most activities, we process personal information under legitimate interests, contract, legal obligation or consent. Where we need to process special category data, such as health information, we will identify and document an appropriate Article 9 condition, including health or social care purposes or explicit consent where required. These purposes and lawful bases are summarised below.

What we use your information for	Personal Information Processed	Article 6 Lawful Basis	Article 9 Condition (if applicable)
Registering participants for activities, events and programmes (including taking payments if required)	Name, contact details, attendance information, payment details (no payment card details stored)	Legitimate Interests (Art. 6(1)(f)) or Contract (Art. 6(1)(b))	Not applicable
Communicating with participants about activities and events	Contact details	Legitimate Interests (Art. 6(1)(f))	Not applicable
Delivering community sport and physical activity sessions	Registration and participation information	Legitimate Interests (Art. 6(1)(f))	Not applicable
Delivering falls prevention and health improvement programmes	Contact details and health information	Legitimate Interests (Art. 6(1)(f)) or Contract (Art. 6(1)(b))	Health or Social Care Purposes (Art. 9(2)(h))
Assessing suitability and safety for participation	Health information, medical conditions, accessibility requirements	Legitimate Interests (Art. 6(1)(f))	Health or Social Care Purposes (Art. 9(2)(h))
Monitoring programme outcomes	Participation and outcome data	Legitimate Interests (Art. 6(1)(f)) or Consent (Art. 6(1)(a))	Art. 9(2)(h) where health data is involved
Taking payments and donations and administration of Gift Aid if applicable	Contact details and payment details (we do not store payment card details) and gift aid declaration status	Contract (Art. 6(1)(b)) and Legal Obligation (Art. 6(1)(c))	Not applicable
Marketing emails and newsletters	Contact details	Consent (Art. 6(1)(a))	Not applicable
Photography, video and case studies	Images and quotations	Consent (Art. 6(1)(a))	Explicit Consent (Art. 9(2)(a)) where special category data is revealed
Safeguarding concerns and referrals	Contact details, health information, EDI information or other sensitive information	Legitimate Interests (Art. 6(1)(f)), Legal Obligation (Art. 6(1)(c)) or Vital Interests (Art. 6(1)(d)) depending on circumstances	Substantial Public Interest (Art. 9(2)(g))

Where we rely on your consent (for example for marketing or use of photographs), you may withdraw that consent at any time by contacting us using the details in Section 12; this will not affect anything already done based on consent given beforehand.

5. How We Collect Your Information

We may collect personal data about you from several sources, including:

- **directly from you**: for example, when you take part in one of our activities, events, or programmes or access one of our services, or when you interact with our website;
- **from third parties**: in some circumstances, we may receive information about you from organisations that refer or recommend you to our services or activities. This may include: GP Practices, NHS organisations, social prescribing services, local authorities, education providers, partner charities and community organisations; and
- **generated in the course of your application to work/volunteer with us**: for example, referees, former employers, recruitment agencies, background-check providers, pension providers and occupational health providers.

The information we receive will depend on the service involved and may include contact details, referral information, health information and details relevant to the support being provided, as detailed in section 3.

6. Who We Share Information With

We do not sell your personal data. We share it only where necessary and before we share your information with an external provider (such as an organisation or individual running activity sessions), we put a written contract and data agreement in place that requires them to: use your data only for the purposes we specify; keep it confidential and secure; not share it further without our agreement; and delete or return it when the contract ends, in line with data protection law.

We may also need to share limited information with professional advisers (such as lawyers, insurers or auditors), or with the police, courts or regulators where we are legally required or permitted to do so.

Who we share information with	**Why we share information with them**
Partner organisation (where we have a Data Sharing Agreement in place)	To administer, deliver, coordinate and evaluate physical activity, sport and wellbeing services jointly with another organisation where each organisation acts as a separate data controller and uses information for its own specified purposes. We will tell you when this applies.
Service providers and software suppliers (where we have a Data Processing Agreement in place)	To provide secure systems and services for that help us administer and deliver our programmes, projects, services and events and manage participant records securely. This includes customer relationship management (CRM), survey, marketing, fundraising and donation, communication, workforce management and cloud storage platforms. These organisations process information only on our instructions and do not use it for their own purposes.
Recruitment agencies and reference / background-checking providers	To verify references and qualifications, and, where relevant to the role, to carry out DBS or right-to-work checks.
Training providers and professional or regulatory bodies	To arrange and record training undertaken, and to confirm qualifications, professional membership or accreditation (if relevant).
Auditors, insurers and legal advisers	To meet our legal, financial, insurance and charity governance obligations.
Funders and commissioners	Where a funding or contract arrangement requires us to provide limited information (usually anonymised or in aggregate) about participants in the programmes/ projects/ services we provide.
Safeguarding, regulatory and law enforcement organisations	Where this is necessary to protect an individual from harm, manage a safeguarding concern, prevent serious risk, or comply with a legal obligation. Information will only be shared where we consider it necessary, proportionate and lawful to do so. Further information is detailed in our safeguarding policy which is available on our website: https://living-better.org.uk/safeguarding/

7. Transfers of Your Information Outside the UK

Some of the external providers referred to in Section 6 (for example cloud storage providers) may store or process data outside the UK. Where this happens, we ensure appropriate safeguards are in place, such as the UK's adequacy regulations, the International Data Transfer Agreement, or the UK Addendum to the EU Standard Contractual Clauses, so that your information continues to receive an appropriate level of protection. You can ask us for more details about any relevant safeguard by contacting us using the details in Section 12.

Our website contains hypertext links to other sites. Living Better is not responsible for the privacy practices or content of these websites, whether they are hosted inside or outside the UK.

8. How Long We Keep Information and How We Keep It Secure

We take the security of your personal information seriously and have appropriate technical and organisational measures in place to protect your personal data against unauthorised access, loss, misuse or disclosure. This includes role-based access controls, encryption and 2FA/MFA where appropriate, staff training, incident reporting and confidentiality requirements in our contracts with external providers. We regularly review these measures and limit access to your information to those who genuinely need it to run the projects, programmes, events and services we provide.

We complete the NHS Data Security and Protection Toolkit (DSPT) to demonstrate that we meet the required standards for handling NHS and health and care information securely.

Your information will not be kept longer than necessary. The table below provides an overview of how long we normally keep different types of information. The exact retention period may vary depending on the nature of the service, project, programme or event, the information involved and any legal, safeguarding, financial, insurance or regulatory requirements that apply. We regularly review the information we hold and securely delete, destroy or anonymise personal information when it is no longer required.

Retention Schedule:

Record Type	**Retention Period**
Participant service records (where ongoing or recurring activities are involved)	Up to 12 months after your last engagement with the service
Project and programme records (where initiatives are time-limited)	Up to 12 months after the project/programme closes unless a funder/ commissioner prescribes the retention is tied to the closure of the project/programme
Special category data (including health and wellbeing information) collected solely to support participation	For adults: Up to 6 years after your last engagement with the service or project/ programme (*as a claimant has 3 years to start court proceedings but the legal paperwork/ processing can stretch past that date*). For children: until they reach age 21 (*as their right to claim is paused until they reach 18*).
Evaluation, monitoring and survey information	Up to 12 months after programme completion and anonymised where possible
Safeguarding and welfare records	May be retained until retirement age or longer depending on the circumstances. See retention schedule in Safeguarding Policy.
Employment, volunteer and trustee records	6 years after the relationship ends
Unsuccessful applicant records	6 months after recruitment process
Financial records	6 years after the financial year ends following your last engagement with us in line with legal and accounting requirements
Website, CRM and marketing records (consent including but not limited to newsletter sign up, being kept informed about your participation in something we offer)	Until consent is withdrawn or no longer required. CRM back-ups are not kept for longer than 12 months.
Defending a legal or insurance claim by a participant including adult accident records	6 years after the end of the financial year from the date of leaving the project/ programme/ service

9. Employee Rights

Under UK GDPR, you have the right to **be informed** on how we collect and use your personal data (we do this through this Privacy Notice) as well as the right to:

- **Access**: request a copy of the personal data we hold about you through a Subject Access Request. These requests can be written or verbal and must go to our Data Protection Officer (either directly or via any member of the organisation who will forward immediately to the DPO) using the contact details in section 12 and we will respond within the statutory one-month period.
- **Rectification**: ask us to correct inaccurate or incomplete data
- **Erasure**: ask us to delete your data in certain circumstances
- **Restriction**: ask us to limit how we use your data in certain circumstances
- **Object**: object to our use of your data where we rely on legitimate interests, or to certain automated decision-making
- **Data Portability**: request the transfer of your personal data to another organisation, where technically feasible
- **Withdraw consent**: withdraw your consent at any time where we rely on consent as our lawful basis

These rights are not absolute and may be subject to certain exemptions or limitations. To exercise any of these rights, please contact us using the details in Section 12. We will respond within one month, though this may be extended by a further two months for complex requests.

10. Complaints and Data Breach Procedures

Living Better takes the security of your personal information seriously and has internally documented procedures in place to prevent, detect and respond to personal data breaches. If a breach occurs that is likely to result in a risk to your rights and freedoms, we will take appropriate action to contain the breach and, where required by law, the DPO will notify the Information Commissioner's Office (ICO) within 72 hours and any affected individuals where the risk is likely to be high will be notified without undue delay.

Living Better record all breaches (whether they meet the ICO reporting threshold or not) on an internal GDPR reporting log to provide evidence of action taken, outcomes and learnings.

If you have concerns about how your information is handled, please contact Living Better in the first instance using the details in section 12. We will acknowledge receipt of your complaint within 30 days of receiving it. Without undue delay, we will take appropriate steps to respond to your complaint, including making appropriate enquiries, and keep you informed of progress and the outcome.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data protection regulator, at https://ico.org.uk/make-a-complaint/ or by calling 0303 123 1113.

11. Changes To This Notice

We reserve the right to change and update this Privacy Notice, for example to reflect changes in the law or in our working practices. These changes will be publicised on our website. We encourage you to check this occasionally to ensure you are aware of our most up to date version which can be found on our website.

12. How to Contact Us

Living Better Suite 3, James Hall, Parsons Green, St Ives, Cambridgeshire, PE27 4AA
Telephone: 01487 841559
Email of Data Protection Officer (DPO): data@living-better.org.uk

Document Control

Next review date: October 2027

Version	Date	Author/Owner	Description of Change	Reviewed By	Approved By	Approval Date
3.0	September 2026	DPO – Roz Fitches	Updated	Giles Wright	Executive Team and Audit & Assurance Committee	October 2026