

# Esports Wales

## Data Protection (UK GDPR) Policy

**Status:** Board-approved policy

**Applies to:** Directors, Staff, Volunteers, Members, Players, Parents/Carers, Partners

**Owner:** Board of Directors

**Data Protection Lead:** Board-appointed Director / Senior Officer

**Safeguarding Lead:** Designated Safeguarding Lead (DSL)

**Review cycle:** Annual

**Next review due:** 12 months from adoption

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### 1. Purpose

This policy sets out how **Esports Wales CIC** (“the Company”) collects, uses, stores, and protects **personal data** in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

It exists to:

- protect the rights and privacy of individuals
  - ensure personal data is handled lawfully, fairly, and transparently
  - support safeguarding, welfare, and governance obligations
  - provide clarity on roles, responsibilities, and processes
  - reduce risk of data breaches or misuse
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### 2. Scope

This policy applies to:

- all personal data processed by Esports Wales

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Version Number: 001



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- data held in digital, paper, and online systems

It covers data relating to:

- players and participants
  - children and young people
  - parents and carers
  - staff, volunteers, coaches, and officials
  - members, partners, and stakeholders
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### 3. Data Protection Principles

Esports Wales processes personal data in line with the **seven UK GDPR principles**:

1. **Lawfulness, fairness, and transparency**
  2. **Purpose limitation** – data used only for specified purposes
  3. **Data minimisation** – only necessary data collected
  4. **Accuracy** – data kept up to date
  5. **Storage limitation** – data not kept longer than necessary
  6. **Integrity and confidentiality** – data kept secure
  7. **Accountability** – responsibility for compliance
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### 4. Lawful Bases for Processing

Esports Wales processes personal data under one or more lawful bases, including:

- **Consent** (e.g. marketing, media, minors where appropriate)
- **Contract** (e.g. participation, membership, delivery agreements)



- **Legal obligation** (e.g. safeguarding, statutory duties)
- **Vital interests** (e.g. safeguarding and emergency situations)
- **Legitimate interests** (e.g. governance, competition delivery)

Special category data (e.g. health, safeguarding) is processed **only where permitted by law** and with additional protections.

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## 5. Children's Data

5.1 Esports Wales recognises that children's personal data requires **additional protection**.

5.2 When processing data relating to children:

- data collection is limited to what is necessary
  - parental/carer consent is obtained where required
  - safeguarding obligations may override consent where risk exists
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## 6. Safeguarding & Data Protection

6.1 Safeguarding information is **highly sensitive**.

6.2 Such data will:

- be shared only on a strict need-to-know basis
- be handled by authorised individuals
- not be withheld where doing so would place a person at risk

6.3 Safeguarding obligations **override data protection restrictions** where legally permitted.

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## 7. Data Subject Rights

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Individuals have the right to:

- access their personal data
- request correction of inaccurate data
- request erasure (where applicable)
- restrict or object to processing
- data portability (where applicable)

Requests must be made in writing and will be responded to **within statutory timeframes**.

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## **8. Data Security**

Esports Wales takes appropriate measures to protect personal data, including:

- secure digital systems and access controls
  - password protection and role-based access
  - secure storage of physical records
  - guidance and training for staff and volunteers
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## **9. Data Sharing**

9.1 Personal data may be shared with:

- safeguarding agencies
- competition partners
- schools or delivery partners
- regulators or authorities

9.2 Data is shared:

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- lawfully
  - proportionately
  - only where necessary
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## **10. Data Breaches**

10.1 A data breach includes:

- loss, theft, or unauthorised access to data
- accidental disclosure or destruction

10.2 All data breaches must be:

- reported immediately to the Data Protection Lead
  - recorded and assessed
  - reported to the ICO where legally required
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## **11. Retention & Disposal**

11.1 Personal data will be:

- retained only as long as necessary
- disposed of securely when no longer required

11.2 Retention periods are set out in:

- **0803 Data Retention & Disposal Policy**
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## **12. Roles & Responsibilities**

### **12.1 Board of Directors**

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- holds ultimate accountability for data protection compliance

## 12.2 Data Protection Lead

- oversees compliance with UK GDPR
- manages data protection queries and incidents
- reports issues to the Board

## 12.3 Staff, Volunteers & Officials

- must follow this policy
  - must protect personal data
  - must report concerns or breaches immediately
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## 13. Training & Awareness

Esports Wales will:

- provide data protection guidance and training
  - ensure key roles understand their responsibilities
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## 14. Complaints & Concerns

Concerns about data protection may be raised via:

- complaints procedures
- whistleblowing routes

Individuals also have the right to complain to the **Information Commissioner's Office (ICO)**.

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## 15. Linked Policies & Procedures

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This policy must be read alongside:

- **0802 Privacy Policy**
  - **0803 Data Retention & Disposal Policy**
  - **0213 Online Safety & Digital Safeguarding Policy**
  - **0201 Safeguarding Policy Statement**
  - **0704 Complaints Policy**
  - **0116 Whistleblowing Policy**
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## **16. Review**


This policy shall be reviewed:

- annually
  - following data protection incidents
  - following changes in legislation or guidance
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## **17. Adoption**

This Data Protection (UK GDPR) Policy was approved by the Board of Directors of **Esports Wales CIC**.

**Date approved:** \_\_02/03/2026\_\_

**Signed (Chair):**\_\_\_\_  \_\_\_\_\_

