WENTWORTH
FOUNDATION

Privacy Policy

Annual review due: October 2027

1. Introduction

The Wentworth Golf and Tennis Foundation ("the Foundation", "we", "us") is committed to protecting the privacy of everyone whose personal data we hold. This policy explains what personal data we collect, why we collect it, how we use it, and the rights people have over their data.

The Foundation is the data controller for the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Registered address: Wentworth Club Limited, Wentworth Drive, Virginia Water, Surrey GU25 4LS

Registered Charity No.: 1006003

Company No.: 02632558

This policy should be read alongside our Data Protection Policy, which sets out the Foundation's internal framework for compliance with data protection law.

2. What Personal Data We Collect

We collect and process personal data in connection with the following groups of people:

2.1 Scholars and programme participants

- Name, date of birth, contact details (and those of parents or guardians)
- School, sporting performance data and programme progress records
- Health and medical information relevant to participation in our activities
- Photographs and video footage taken during Foundation activities
- Emergency contact information

2.2 Donors and supporters

- Name and contact details
- Donation history and Gift Aid declarations
- Communication preferences

2.3 Volunteers and coaches

- Name and contact details
- DBS check reference number and date
- Qualifications and relevant training records

2.4 Trustees

- Name and contact details
- Declaration of interests
- Records required for Companies House and Charity Commission filings

2.5 Website visitors

- We do not currently collect any personal data via our website beyond what is volunteered through a contact form

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3. Lawful Bases for Processing

Purpose	Lawful basis
Administering the scholarship and programme	Contractual necessity; legitimate interests
Safeguarding and child protection	Legal obligation; vital interests
Sending Gift Aid claims to HMRC	Legal obligation
Fundraising communications (with consent)	Consent
Reporting to funders	Contractual necessity; legitimate interests
Processing DBS checks	Legal obligation
Trustee governance records	Legal obligation
Photography / video (marketing use)	Consent

4. Children's Data

A significant proportion of the data we hold relates to children and young people under the age of 18. We treat this data with particular care. We collect personal data about under-18s only with the consent of a parent or guardian. All data relating to children is treated as sensitive and access is strictly limited to those with a legitimate need.

5. Special Category Data

We may process special category data (such as health information) where this is necessary for the safeguarding of scholars or for the management of medical needs during activities. Such data is collected on the basis of explicit consent and/or substantial public interest, and is subject to strict access controls.

6. How Long We Keep Personal Data

Category	Retention period
Scholar and programme records	Duration of scholarship plus 7 years
Safeguarding records	Minimum 7 years (longer where required by law or guidance)
Gift Aid declarations	7 years from the date of the last donation
Financial records	7 years
Trustee governance records	Indefinitely (as required by charity law)
Consent forms (photography)	3 years after the individual's participation ends

Data is securely deleted or anonymised when the retention period expires.

7. Who We Share Data With

We do not sell personal data. We share personal data only where necessary and with appropriate safeguards:

- Wentworth Club Limited - for operational purposes (shared venue, events)
- Accountability Europe - for Gift Aid processing
- Charity Commission for England and Wales - for regulatory reporting
- HMRC - for Gift Aid claims
- Microsoft 365 - for cloud-based document storage and communication (data processed within the UK/EEA)
- QuickBooks - for financial record-keeping
- Statutory authorities (police, children's services) - where required by law or for safeguarding purposes

8. Your Rights

Under UK GDPR, you have the following rights in relation to your personal data:

- The right to access your data
- The right to rectification (correction of inaccurate data)
- The right to erasure ("right to be forgotten") - subject to our legal obligations
- The right to restrict processing
- The right to data portability
- The right to object to processing
- The right to withdraw consent (where processing is based on consent)

To exercise any of these rights, please contact the Head of Foundation at Christopher.allbut@wentworth-foundation.com. We will respond within one month.

9. Complaints

If you are not satisfied with how we have handled your personal data, you have the right to complain to the Information Commissioner's Office (ICO):

- Website: www.ico.org.uk
- Telephone: 0303 123 1113

10. Review

This policy will be reviewed annually by the Board of Trustees, or following any significant change in data processing activities or applicable law.