

# Empire Grappling Events Ltd

## Data Protection Policy

**(Updated January 2026)**

### Introduction

Empire Grappling Events Ltd needs to collect and use certain types of information about individuals and organisations in order to carry out its activities. This personal data may relate to athletes, staff, volunteers, partners, event participants, customers, suppliers and other individuals connected with the organisation.

This personal data must be collected and processed appropriately whether it is collected on paper, stored electronically, or recorded in any other format.

Empire Grappling Events Ltd is committed to ensuring that personal data is handled in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

For the purposes of data protection legislation, **Empire Grappling Events Ltd acts as the Data Controller** for the personal data it processes.

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### Lawful Processing and Data Protection Principles

Empire Grappling Events Ltd will ensure that personal data is processed in accordance with the **data protection principles set out in UK GDPR**.

Personal data will be:

1. Processed lawfully, fairly and transparently.
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and, where necessary, kept up to date.
5. Kept in a form which permits identification of individuals for no longer than necessary.
6. Processed in a manner that ensures appropriate security of the personal data.

Empire Grappling Events Ltd will only process personal data where a **lawful basis for processing applies**, including:

- Consent
- Performance of a contract
- Compliance with a legal obligation
- Protection of vital interests
- Legitimate interests pursued by the organisation

Where **special category data** (such as health data or equality monitoring information) is processed, an additional lawful condition under UK GDPR will also apply.

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### Data Disclosure

Empire Grappling Events Ltd may share personal data with relevant organisations where this is necessary for legitimate operational purposes. This may include:

- Regulatory bodies
- Event partners
- Local authorities
- Funding organisations
- Professional advisers
- Service providers supporting the delivery of events or services

Empire Grappling Events Ltd **will not sell personal data or share it with third parties for commercial gain.**

Personal data may also be disclosed where required:

- To comply with a legal obligation
- In connection with legal proceedings
- To obtain legal advice
- To protect the vital interests of an individual
- Where the information has already been made public by the individual
- For equality monitoring purposes where, appropriate safeguards apply
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Individuals will normally be informed how their information will be used and with whom it may be shared, unless doing so would be unlawful or impractical.

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## Data Subject Rights

Under UK GDPR, individuals have the following rights regarding their personal data:

- The right to be informed about how their data is used
- The right of access to their personal data (Subject Access Request)
- The right to rectification of inaccurate data
- The right to erasure (“right to be forgotten”) in certain circumstances
- The right to restrict processing
- The right to data portability where applicable
- The right to object to processing in certain circumstances
- Rights related to automated decision-making and profiling

Empire Grappling Events Ltd will respond to legitimate requests in accordance with UK GDPR requirements.

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## Data Collection

Personal data will only be collected where it is necessary for the organisation's activities.

When collecting personal data, Empire Grappling Events Ltd will ensure that individuals:

- Understand why their information is required
- Understand how their information will be used
- Are informed of any organisations the data may be shared with
- Are aware of their rights under data protection law

Where consent is relied upon as the lawful basis for processing, it will be:

- Freely given

- Specific
- Informed
- Unambiguous

Individuals will also have the right to withdraw consent at any time.

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### Data Storage and Security

Empire Grappling Events Ltd will ensure that personal data is stored securely using appropriate technical and organisational measures.

This includes:

- Secure digital storage systems
- Access controls limiting data to authorised personnel
- Password protection and secure systems
- Secure disposal of physical and digital records

Personal data will only be retained for as long as necessary to fulfil the purpose for which it was collected or to meet legal or regulatory requirements.

When equipment or systems are disposed of or transferred, all personal data will be securely deleted to ensure it cannot be recovered.

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### International Data Transfers

Personal data will not be transferred outside the **United Kingdom** unless appropriate safeguards are in place. These safeguards may include:

- Transfers to countries recognised by the UK as providing an adequate level of protection
  - Use of approved contractual safeguards
  - Other lawful transfer mechanisms permitted under UK GDPR
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### Data Access and Accuracy

Empire Grappling Events Ltd will take reasonable steps to ensure that personal data is accurate and kept up to date.

Individuals may request access to the personal data held about them and may request corrections where the information is inaccurate or incomplete.

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### Data Protection Responsibilities

Empire Grappling Events Ltd will ensure that:

- A **designated Data Protection Officer or responsible person** oversees compliance with data protection legislation
- Staff and volunteers handling personal data understand their responsibilities
- Appropriate training is provided where required
- Data protection practices are regularly reviewed and audited

- Procedures are in place for responding to data protection queries and complaints

Any breach of this policy or misuse of personal data may result in disciplinary action.

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### **Policy Review**

This policy will be reviewed periodically to ensure it remains compliant with the **Data Protection Act 2018, UK GDPR**, and guidance issued by the **Information Commissioner's Office (ICO)**.

Questions regarding this policy or the handling of personal data should be directed to the organisation's designated data protection contact.