

PRIVACY NOTICE

Last updated: 15 May 2026

Please note the ISPO Impact Foundation is currently in the process of applying for registration as a charity in England and Wales. We intend to register with the Charity Commission for England and Wales and to obtain registration with the Information Commissioner's Office ("ICO"). This Privacy Notice reflects our current practices and our intentions as a data controller. All references in this document to our charity registration number, registered address and ICO registration number will be updated as soon as registration is confirmed.

At the ISPO Impact Foundation, we believe that trust is fundamental to everything we do. We are a charitable organisation dedicated to protecting the natural environments in which outdoor sport and recreation take place, and to opening up access to the outdoors for everyone. We apply the same values of care, transparency and accountability to the way we handle personal information.

Whether you are visiting our website, applying for a grant, receiving funding from us, working as a trustee or advisory council member, or providing services to us, we are committed to treating your personal data with respect. We collect only what we need, we keep it only for as long as necessary, and we are always happy to explain how and why we use it.

This Privacy Notice sets out who we are, what personal data we collect about you, why we collect it, how we protect it, and what your rights are.

1. Key terms

Summary: Before reading this Privacy Notice, it may help to understand the following key data protection terms, which are used throughout.

Term	Meaning
Consent	A freely given, specific, informed and unambiguous indication of a data subject's wishes, by which they signify agreement to the processing of their personal data. Consent must be given by a clear affirmative act — pre-ticked boxes or silence do not constitute valid consent.
Data controller	A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data. The data controller decides the "why" and the "how" of processing and bears full accountability to data subjects and to the ICO.
Data processor	A natural or legal person, public authority, agency or other body which processes personal data on behalf of, and strictly under the instructions of, a data controller. A data processor does not determine the purposes or means of processing.
Data protection law	The body of law applicable to the processing of personal data in the United Kingdom, including the UK General Data Protection Regulation ("UK GDPR"); the Data Protection Act 2018; the Data (Use and Access) Act 2025; and the Privacy and Electronic

	Communications (EC Directive) Regulations 2003 (" PECR "), in each case as amended or re-enacted from time to time.
Data subject	An identified or identifiable natural person to whom personal data relates. This privacy notice addresses six categories of data subject: website users, grant applicants, grant recipients, prospective employees, trustees and advisory council members, and third-party suppliers' staff and contacts.
Lawful basis	The legal grounds under data protection law that an organisation may rely upon to process personal data lawfully. The most relevant bases to the Foundation are: (1) consent; (2) contract; (3) legal obligation; and (4) legitimate interests.
Legitimate interests	Processing is permissible on the basis of legitimate interests where it is necessary for the purposes of the data controller's or a third party's genuine and lawful interests, and where those interests are not overridden by the interests or fundamental rights and freedoms of the data subject.
Personal data	Any information relating to an identified or identifiable natural person. A person is identifiable if they can be identified directly or indirectly – in particular by reference to an identifier such as a name, identification number, location data, an online identifier, or factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity.
Processing	Processing means anything that is done with personal data, whether by automated means or not. This includes collecting, recording, storing, using, sharing, altering or deleting personal data.
Special category data	A particularly sensitive subset of personal data that receives enhanced protection under data protection law. It includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, and data concerning a person's sex life or sexual orientation.

2. What is our categorisation under data protection laws?

Summary: The ISPO Impact Foundation is a data controller. This means we decide how and why personal data is processed, and we are directly accountable for the way we handle it.

The ISPO Impact Foundation ("**Foundation**", "**we**", "**us**" or "**our**") is a charitable organisation in the process of registering as a charity in England and Wales and is subject to data protection law.

Under data protection law, organisations that process personal data are classified as either a data controller or a data processor, and the rights and obligations that apply to each are fundamentally different.

The Foundation acts as a data controller in relation to the personal data it processes in the course of carrying out its charitable activities. In particular, we act as a data controller when processing personal data relating to:

- visitors to and users of our website;
- organisations and individuals applying to us for grant funding;

- organisations and individuals who receive grant funding from us;
- prospective employees who apply to work for the Foundation;
- our trustees and advisory council members; and
- suppliers, contractors and other third parties with whom we work.

In these contexts, the Foundation determines the purposes for which personal data is processed and the means by which that processing is carried out, in accordance with data protection law.

3. Do we have a data protection officer?

Summary: We do not currently need to appoint a data protection officer, but we take data protection seriously and have a designated contact for all privacy queries.

We are not currently required under data protection law to appoint a data protection officer ("DPO"). The obligation to appoint a DPO applies to organisations whose core activities involve large-scale, systematic monitoring of individuals or large-scale processing of special category data. As a small charity, our data processing activities do not meet that threshold. We take data protection seriously nonetheless and are always happy to answer questions about how we handle personal data. Any queries regarding this Privacy Notice or our data protection practices should be directed to us using the contact details in Section 11.

4. What is our approach to data protection compliance?

Summary: We process personal data lawfully, fairly and transparently. We collect only what we need, use it only for the purpose it was collected, and keep it only for as long as is necessary.

We are committed to processing personal data responsibly and in compliance with applicable data protection law. Our approach is grounded in the following principles:

- Lawfulness, fairness and transparency – we only process personal data where we have a valid lawful basis for doing so, and we are transparent with individuals about how their data is used.
- Purpose limitation – we collect personal data for specified, explicit and legitimate purposes and do not process it in a manner incompatible with those purposes.
- Data minimisation – we only collect and process the personal data that is necessary for the relevant purpose.
- Accuracy – we take reasonable steps to ensure that personal data is accurate and, where necessary, kept up to date.
- Storage limitation – we retain personal data only for as long as is necessary for the purposes for which it was collected, as described in Section 9.
- Integrity and confidentiality – we implement appropriate technical and organisational measures to protect personal data against unauthorised or unlawful processing, accidental loss, destruction or damage.
- Accountability – we maintain records of our processing activities and take responsibility for demonstrating compliance with the above principles.

The lawful bases on which we rely when processing personal data include:

- Contract – processing is necessary to perform a contract with you or to take steps at your request prior to entering into a contract (for example, processing a grant application or onboarding a new employee).
- Legitimate interests – processing is necessary for our legitimate interests or those of a third party, where those interests are not overridden by your rights and interests (for example, administering our grant making programme, managing our website, and maintaining records for the Foundation's accountability obligations).
- Legal obligation – processing is necessary to comply with a legal obligation to which we are subject (for example, retaining financial records in accordance with charity law and HMRC requirements, and complying with our obligations to the Charity Commission).
- Consent – in limited circumstances, we may seek your consent for a specific processing activity (for example, publishing photographs or personal stories in connection with a funded project). Where we rely on consent, you have the right to withdraw it at any time without detriment, though withdrawal does not affect the lawfulness of any processing carried out before withdrawal.

5. What types of personal data do we collect?

Summary: The types of personal data we process depend on your relationship with us. The table below sets out the categories that may be relevant.

Category of personal data	Examples
Identity data	First and last name, username or similar identifier, job title, organisation name.
Contact data	Email address, telephone number, postal address.
Application and grant data	Names, job titles and contact details of project staff, key personnel and trustees named in an application or report; details of individual beneficiaries or project participants where identified by name or other identifying information; personal accounts, testimonials, stories and quotes provided by or about named individuals; photographs and videos depicting identifiable individuals submitted in connection with a funded project; expenditure records and receipts where these contain the names of individuals.
Financial and banking data	Bank account details, IBAN and SWIFT/BIC codes, payment records and receipts provided in connection with grant awards.
Employment and recruitment data	CV, work history, qualifications, references and interview notes (for prospective employees).
Governance data	Names, contact details, declarations of interest, meeting attendance records and other information relating to trustees and advisory council members.
Technical and usage data	IP addresses, browser type, pages visited and other technical data collected automatically through the operation of our website.

Communications data	Email correspondence and other communications between us and data subjects in the course of our activities.
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We do not knowingly collect personal data from children under the age of 18 other than where it arises incidentally in the context of funded projects (for example, project photographs). Where images are shared with us by grantees, we rely on the grantee having obtained all necessary consents before sharing that material with us.

6. What categories of data subjects do we interact with?

Summary: We interact with eight categories of individuals: website users, grant applicants, grant recipients, prospective employees, trustees and advisory council members, strategic fund advisers and third-party suppliers' staff. This section explains what personal data we collect about each group and why.

6.1. Website users

When you visit our website, we may process the following personal data:

- Technical information, such as your IP address, browser type and version, operating system and the pages you visit, collected automatically through the operation of the website.
- Enquiry information, such as your name, email address, telephone number and the contents of any message you submit via our contact form or other website functionality.
- Newsletter subscription information, such as your name and email address if you sign up to receive updates from us via our newsletter provider.

We process the personal data of website users on the basis of our legitimate interests – specifically, our interest in operating and improving our website, responding to enquiries, maintaining the security of our systems, and communicating our work and impact to those who wish to hear about it. Where you sign up to receive our newsletter or other communications, we rely on your consent as the basis for doing so.

6.2. Grant applicants

When an organisation applies to the Foundation for grant funding, we process personal data about the individuals who represent or are named in connection with that application. This includes:

- Identity and contact data of the authorised representative(s) submitting the application (name, job title, email address, telephone number).
- Organisational information included in the application, which may refer to named individuals (for example, key project staff or trustees of the applying organisation).
- Application content, to the extent it contains personal data about named individuals – see Section 5 for further detail.
- Any correspondence between the Foundation and the applicant organisation during the assessment process.

We retain the personal data contained in unsuccessful applications for a period of one year from the date on which we notify applicants of the outcome of the relevant funding round. This retention period reflects the risk that an applicant may seek to challenge a funding decision – for example, on grounds of procedural unfairness or unlawful discrimination and ensures that we are able to respond to any such challenge with the relevant application materials.

We process the personal data of grant applicants on the basis of our legitimate interests – in particular, our interest in assessing and managing applications fairly, operating our funding programme, and maintaining records of the Foundation's grant making activities. We also process certain personal data to comply with our legal obligations as a registered charity, including our reporting obligations to the Charity Commission.

6.3. Grant recipients

When an organisation receives a grant from the Foundation, we process personal data about the individuals who represent or are named in connection with the funded project throughout the grant period and for a reasonable period afterwards. This includes:

- Identity and contact data of the primary contact at the grantee organisation.
- Bank account and financial details provided to enable grant payments (held in the registered name of the grantee organisation, not of individuals).
- Mid-term and final completion reports submitted by the grantee, which may include references to named individuals involved in project delivery or beneficiaries.
- Photographs and, where provided and consented to, personal stories or quotes relating to the funded project and its beneficiaries
- Any correspondence between the Foundation and the grantee during and after the grant period.

We publish the name, logo, website link and project description of all successful grantees on our website as a permanent record of our grant making and impact. These project pages contain only organisational information. We will not publish the names of individual beneficiaries, project photographs or personal stories without first checking with the grantee, and we rely on the grantee to have obtained all necessary consents before sharing such material with us.

We process the personal data of grant recipients primarily on the basis of contract – processing is necessary to administer the Grant Agreement and to release payments in accordance with its terms. We also rely on our legitimate interests, including our interest in monitoring and evaluating the impact of the projects we fund, maintaining records of our grant making, and sharing the story of our impact with the wider sports and outdoor sector. Where processing is required to comply with our obligations as a registered charity including our accountability and reporting requirements to the Charity Commission – we rely on legal obligation.

6.4. Prospective employees

When you apply for a position with us (whether directly or via a third-party recruiter or job platform), we process personal data about you for the purpose of evaluating your application and, if successful, preparing for employment. The personal data we collect typically includes:

- Identity and contact data (name, address, email address, telephone number).
- CV and professional history (employment history, qualifications, skills, professional memberships and any other information included in your CV or application).
- References and verification data (where we contact referees with your permission or carry out right-to-work checks).
- Interview notes and assessment outcomes.

We process the personal data of prospective employees primarily on the basis of our legitimate interests – in particular, our interest in assessing suitability for roles and managing our recruitment process effectively. Where processing is required to comply with legal obligations — such as right-to-work checks and other statutory

requirements – we rely on that basis accordingly. Where you are offered and accept a position with us, processing necessary to take steps prior to entering into an employment contract is carried out on the basis of contract.

6.5. Trustees and advisory council members

We process personal data about our trustees and advisory council members in connection with their governance roles with the Foundation. This includes:

- Identity and contact data (name, email address, telephone number).
- Professional information shared with us in connection with their role (for example, biographical information for publication on our website).
- Records of meeting attendance, decisions made, and any declarations of interest.
- Any correspondence with us in their capacity as trustees or advisory council members.

Trustees and advisory council members serve on a voluntary basis. We will always discuss with individuals before publishing any biographical or personal information about them on our website or in our communications.

We process the personal data of trustees and advisory council members on several bases. Where processing is necessary to carry out the terms of a trustee's or advisory council member's letter of appointment or equivalent agreement – for example, to reimburse expenses or administer their role – we rely on contract. We also process certain personal data to comply with our legal obligations as a registered charity, in particular our obligations to the Charity Commission in relation to trustee information and governance records. We additionally rely on our legitimate interests, including our interest in managing the Foundation's governance effectively and maintaining appropriate records of decisions and activity.

6.6. Strategic fund advisers

We work with strategic fund advisers who act in an advisory capacity on behalf of Raccoon Media Group. The advisers do not hold voting rights in relation to funding decisions but are privy to grant application materials and related discussions in the course of their advisory role. Where grant application materials (including any personal data that they contain) are shared with strategic advisers, this is done on a confidential, need-to-know basis. We process personal data relating to the advisers on the basis of our legitimate interests – in particular, our interest in managing the grant making process effectively and in accordance with our governance arrangements.

6.7. Third-party suppliers (their staff)

We interact with the staff and representatives of third-party organisations that provide services to the Foundation. This includes employees and contacts at:

- Our website design provider (Designworks).
- Our newsletter and communications platform provider (Delivra).
- Freelancers and contractors engaged to support the Foundation's work (for example, video production).
- Professional advisers, including legal advisers, accountants and other professional services providers.
- Any other third-party providers engaged by the Foundation from time to time.

The personal data we process in this context is typically limited to identity and contact data (names, job titles, email addresses and telephone numbers) together with any correspondence and commercial or transactional information relevant to the relationship.

We process the personal data of third-party suppliers' staff and contacts on the basis of contract, where processing is necessary to perform our obligations under supplier and service agreements, and on the basis of our legitimate interests – in particular, our interest in managing our operational relationships and ensuring the effective day-to-day administration of the Foundation.

7. Who do we share personal data with?

Summary: We do not sell personal data. We share it only where necessary and with our advisory council and trustees for grant assessment, with technology providers who support our operations, with professional advisers, and with regulators where required by law.

We do not sell personal data to third parties. We may share personal data with the categories of recipients below where it is necessary and proportionate to do so.

7.1. Advisory council and trustees

Grant application materials (including any personal data they contain about the individuals connected to applying organisations) are shared with our advisory council members and trustees on a confidential, need-to-know basis for the purposes of assessing applications and making funding decisions. All individuals involved in the assessment and decision-making process are required to maintain appropriate confidentiality.

7.2. Strategic fund advisers

Grant application materials are also shared with our strategic fund advisers on a confidential, need-to-know basis. The advisers act in an advisory capacity on behalf of Raccoon Media Group and do not hold voting rights but are involved in grant assessment discussions. The advisers are required to maintain appropriate confidentiality in respect of all information shared with them.

7.3. Technology and platform providers

We use a small number of third-party technology platforms to operate the Foundation. These providers may act as data processors on our behalf and are subject to appropriate contractual arrangements:

- **Delivra** — our newsletter and email communications platform, used to manage subscriber lists and send updates to those who sign up to hear from us.
- Our website hosting provider and **Designworks** — for the operation and maintenance of our website.
- Other operational tools and platforms used from time to time in running the Foundation.

7.4. Professional advisers

We share personal data with our legal advisers, accountants, auditors and insurers where necessary for the purposes of obtaining professional advice, managing legal matters or fulfilling our regulatory obligations.

7.5. The Charity Commission and other regulatory authorities

As a UK registered charity, we are required to report certain information to the Charity Commission for England & Wales and to cooperate with its oversight of our activities. We may also disclose personal data to other regulatory

authorities, law enforcement agencies or courts where required to do so by law, or where necessary to establish, exercise or defend legal rights.

7.6. ISPO and Raccoon Media Group

The Foundation receives its annual funding from ISPO (the world's leading sports and outdoor trade fair) as part of its relationship with the Raccoon Media Group. Where strictly necessary and proportionate, we may share relevant information with ISPO and Raccoon Media Group in connection with the administration and oversight of that funding relationship. Any such sharing is subject to appropriate confidentiality arrangements.

7.7. International transfers

The Foundation operates globally and funds projects in many countries. Where we transfer funds internationally to grantees, this involves sharing bank account and related financial details with international banking providers. We ensure that these transfers are made in accordance with our obligations under data protection law.

Some of our third-party technology providers may process data on servers located outside the United Kingdom. Where personal data is transferred outside the UK, we ensure that appropriate safeguards are in place in accordance with data protection law – for example, by relying on an adequacy decision by the UK Secretary of State, or by implementing the International Data Transfer Agreement or the UK Addendum to the European Commission's Standard Contractual Clauses.

Where we rely on consent as the lawful basis for any processing activity – for example, where a grantee's project contact has agreed to be featured on our website – that consent also covers the international dimension of that processing where applicable. Individuals can withdraw their consent at any time by contacting us using the details in Section 11, though withdrawal will not affect the lawfulness of any transfer or processing already carried out. If you would like further information about the specific transfer mechanisms we rely upon, please contact us.

8. How do we ensure that your personal data is protected?

Summary: We take personal data security seriously. The measures below reflect both our general data protection obligations and the specific risks associated with our international grant making activities, including the handling of financial information and the processing of application materials.

We take the security of personal data seriously and implement appropriate technical and organisational measures to protect it against accidental loss, unauthorised access, disclosure, alteration or destruction.

Measure	Description
Access controls	Access to systems and personal data is granted on a need-to-know basis. We limit access to application materials and grant records to those involved in the relevant assessment and administration processes.
Confidential handling of applications	Grant applications are treated as confidential. Application content is shared only with reviewers and advisory council members on a need-to-know basis for the purposes of assessment and decision-making.

Bank details verification	We verify bank account details before making grant payments. We may contact grantee representatives by telephone to verify bank details prior to transfer, as an additional safeguard against fraud.
Sanctions screening	We screen all applicants against applicable sanctions lists (UK, EU, UN and US) as part of our due diligence obligations as a UK registered charity.
Supplier due diligence	We take steps to ensure that third-party providers who process personal data on our behalf have appropriate security measures in place and are subject to contractual data protection obligations.
Data minimisation	We aim to collect only the personal data that is necessary for the relevant purpose. We do not seek information about individual project beneficiaries beyond what grantees choose to share with us in their reports.
Consent before publication	We always check with grantees before publishing new content about their projects. We do not publish the names of individuals, photographs of identifiable people or personal stories without first seeking the grantee's confirmation that appropriate consents have been obtained.

9. How long do we keep data?

Summary: We keep personal data only for as long as is necessary for the purpose it was collected, or as required by law. The table below sets out our approach to retention for each category of data subject.

We only keep personal data for as long as is necessary for the purpose for which it was collected, unless we are required to keep it for longer to comply with our legal obligations. At the end of the appropriate retention period, personal data will be deleted or, where possible, anonymised.

In determining the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the data, and our applicable legal, regulatory and accounting obligations. We may retain personal data for longer in the event of a complaint or where we reasonably believe there is a prospect of litigation.

Category	Retention approach
Website users	Technical and usage data is retained for a limited period to enable website operation, security monitoring and improvement. Enquiry data is retained for as long as is necessary to respond to and follow up on the enquiry.
Unsuccessful grant applicants	The personal data contained in unsuccessful applications is retained for one year from the date on which applicants are notified of the outcome of the relevant funding round. This period allows us to respond to any challenge to a funding decision – for example, on grounds of procedural unfairness or unlawful discrimination. After one year, unsuccessful applications are securely deleted.
Successful grant applicants and recipients	Grant applications, grant agreements, reports and related correspondence are retained for the duration of the grant period and for a period of at least six years

	after the grant is closed, in accordance with our obligations as a UK registered charity and HMRC requirements.
Project pages	We maintain project pages on our website as a permanent record of the Foundation's grant making and impact for as long as the Foundation exists. These pages contain only organisational information (name, logo, website link and project description) and no personal data about individuals. Grantees who wish to request removal of their project page may do so in writing.
Prospective employees	Unsuccessful applications are retained for a short period after the relevant role is filled (typically six months) and then deleted. If you consent to us retaining your details for future roles, we will retain them for up to one year.
Trustees and advisory council members	Governance records relating to trustees are retained for the duration of their term and for a period of at least six years after their term concludes, in accordance with our obligations as a UK registered charity.
Third-party suppliers	Contact and transactional data relating to suppliers and contractors is retained for the duration of the relationship and for a period of at least six years thereafter, in accordance with our accounting and legal obligations.

10. What rights do you have in respect of your personal data?

Summary: Under data protection law you have a number of rights in respect of your personal data. These include rights of access, rectification, erasure, restriction, portability and objection. You can also lodge a complaint with the ICO.

Under data protection law, individuals whose personal data we process have a number of rights. These are set out below, together with an explanation of how to exercise them and the timescales within which we will respond.

- Right of access – You have the right to request a copy of the personal data we hold about you and to receive information about how we process it.
- Right to rectification – You have the right to ask us to correct any inaccurate personal data we hold about you, or to complete any incomplete personal data.
- Right to erasure – You have the right to ask us to delete your personal data in certain circumstances; for example, where it is no longer necessary for the purpose for which it was collected, or where you withdraw consent (where consent was the lawful basis). This right is not absolute and may be subject to our overriding legitimate interests or legal obligations, for example where we are required to retain records as a UK registered charity.
- Right to restriction of processing – You have the right to ask us to restrict or suspend our processing of your personal data in certain circumstances — for example, if you contest its accuracy or if you have objected to processing and we are assessing whether our legitimate grounds override your interests.
- Right to data portability – Where processing is based on consent or on the performance of a contract, and is carried out by automated means, you have the right to receive your personal data in a structured, commonly

used and machine-readable format and, where technically feasible, to request that it be transferred to another data controller.

- Right to object – You have the right to object to our processing of your personal data where we rely on legitimate interests as our lawful basis. We will cease processing unless we can demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the processing is necessary for the establishment, exercise or defence of legal claims.
- Rights in relation to automated decision-making and profiling – You have the right not to be subject to a decision based solely on automated processing including profiling that produces legal or similarly significant effects concerning you. We do not make automated decisions of this nature in respect of individuals. All funding decisions are made by our advisory council following a human review process.

To exercise any of the rights described above, please contact us using the details set out in Section 11. You may submit a request by email or in writing to our registered address. There is no charge for making a rights request in the ordinary course. We may need to verify your identity before proceeding, in order to protect the security of your personal data.

We will respond to all valid rights requests within one calendar month of receipt. In cases of complexity or where we receive a high volume of requests, we may extend this period by a further two months. If we do so, we will notify you within the initial one-month period and explain the reason for the extension. If we are unable to fulfil your request – for example, because an exemption under data protection law applies, we will explain why and inform you of your right to complain to us and the ICO.

If you are dissatisfied with how we have handled your personal data or how we have responded to a rights request, you should contact us in the first instance using the details in Section 11, so that we have the opportunity to address your concerns. If you remain dissatisfied after contacting us, you have the right to lodge a complaint with the ICO at www.ico.org.uk.

11. Who are we and how can you contact us?

Summary: If you have any questions about this Privacy Notice, please contact us using the details below.

Detail	Information
Full legal name	ISPO Impact Foundation
Registered address	2 Bell Court, Leapale Lane, Guildford GU1 4LY
Email	info@ispoimpactfoundation.org
Telephone	+44 203 981 9584