

KETTERING GYMNASTICS CLUB & KETTERING GYM TOTS

Data Privacy Notice – Members, Coaches, Officials and Volunteers

Kettering Gymnastics Club is committed to complying with our legal responsibilities under data protection law. We take your privacy very seriously and will ensure your personal information is kept secure

When we collect, use, share, retain or do anything else with your personal information (known collectively as 'processing') we are regulated under the General Data Protection Regulation (GDPR) and are responsible as 'controller' of your information.

This notice applies to you if you are:

- An existing or prospective member of our club (gymnast or coach);
- A person with parental responsibility for a member;
- An existing or prospective club volunteer or official; and
- Individuals who sign up to receive marketing communications via our website.

It is important that you read this carefully as it contains key information about how we use your personal data and your associated rights.

About us

Kettering Gymnastics Club is a not for profit organisation. Our membership is made up of gymnasts, parents/volunteers and our coaches. We provide the opportunity for our members/people to participate in our activities, which include recreational classes, training camps, competitions, squads and other similar gymnastics or sporting activities.

We are registered with British Gymnastics and English gymnastics who govern our sport, provides insurance for Clubs and individual members and offers competitions and events. It is a condition of British Gymnastics and English Gymnastics club registration that all our members taking part in gymnastic activities also register as individual members of British Gymnastics.

We also affiliate to East Midlands Gymnastics Association and Northamptonshire Amateur Gymnastics Association who also run competitions and events which we may participate in.

Information we collect about you

The categories of personal information we process includes:

- Contact details* (gymnast or parent/carer and emergency contacts – telephone number / names etc.)
- Gymnast date of birth*
- Gymnast gender
- Any relevant medical conditions and/or disabilities and additional related information
- Other relevant individual needs for example, information about learning, religious or other support needs.
- Any individual risk assessments (gymnasts and others if applicable)
- Details of any reasonable adjustments or steps taken to support your individual needs
- British Gymnastics memberships details* (which are confirmed by British Gymnastics when you join or renew)
- Gymnast attendance and achievement records
- Any communications from, to or relating to you
- Details relating to standards of conduct
- Medical Screening results completed by medical practitioners at your request.
- Details of gymnastics qualifications/awards you hold and training you have completed.
- Details relating to criminal record checks (disclosure number and date of check), ID documents and any criminal convictions, cautions or official information, warnings and other relevant additional information e.g. references from former employers or information from probation services.
- Any accident or incident reports including details of injuries
- IP address, browser identifier and the time of access (if you use our website)
- Bank or debit/credit card details (if you are making regular payments to us or we are making payments to you e.g. volunteer expenses)
- Payment and transactional information
- Experience, qualifications, training and confirmation that you have completed criminal record check (prospective or existing).
- Clothing sizes
- References
- Email addresses

The information marked with an * above is essential for us to provide your membership. It is your choice whether you provide all the information we have requested but not providing information may affect our ability to meet you or your child's needs and to protect their well-being.

If you are a competitive gymnast, we record other information about you to support your training and participation in competition such as:

- Training and technical information
- Height
- Lifestyle information
- Nationality (if you are competing at international level)

If you attend an event or trip with the club, we will also collect the following information where relevant:

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met: and
- Passport information if the trip is abroad.

If you are supporting us to provide any of our gymnastics activities, we may also collect:

- Additional information about your knowledge, skills and experience
- Role preferences and availability.

In some cases, we will be unable to provide our services unless you provide the requested information but we will tell you at the point of collection if any of the information we are requesting is optional.

Our purposes for processing information about you

We use the information we hold about you for a variety of purposes which are outlined below. Data protection law requires us to tell you what our legal reason is for each purpose.

Contractual purposes

When you ask us to provide you a service, such as club membership or registration, gymnastics classes, competitions, trips or other activities or you buy a product from us we usually need to use information about you to provide this product or service, for example:

- To contact you to confirm arrangements.
- To notify you about changes to terms and conditions.
- To tell you when it is time to renew membership or re-register for activities.
- To process payments or send you receipts where required.
- To provide you with the benefits and services to which you have subscribed.

We do so because it is necessary for the performance of a contract.

Legal obligations

We have a duty of care to ensure it is safe for you or your child to take part in gymnastics activities and to keep you/them safe while participating. Some individuals may be at risk of harm from participating in gymnastics as a result of a pre-existing condition. It is vital that you let us know if there is any reason why taking part in gymnast activity may be unsafe prior to participation. With your agreement, we will review any information you provide and undertake risk assessments in consultation with yourself and any appropriate trained professionals e.g. medical consultants. When we ask participants to provide relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

If you are selected for a role at the club, we will usually obtain a reference from any appropriate organisation or individual you have nominated.

When you tell us about any special needs such as disabilities or other support information we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet your child's needs. We will keep a record of any steps we take to support inclusion.

If you are wishing to volunteer or work for us, we may need to ask you to complete a criminal record check as we have a legal obligation to do so. We jointly control the checking process with British Gymnastics who is responsible for the assessment of any content on the check and will only share information with us where it is appropriate. For example, if you are considered by British Gymnastics to be unsuitable to take on the role, we may share relevant and proportionate information about criminal offences where it is deemed that while you are not considered unsuitable to take on the role, if it is considered necessary for safeguarding purposes.

When we retain information about you, even after you are no longer taking part in gymnastics activity, this is often because we are required to do so by law, such as records we are required to keep for business and accounting purposes. Sometimes we are also legally obliged to share information about you with third parties, more information is provided below.

Legitimate interests

We rely on legitimate interests for following purposes:

- ***Responding to communications, concerns or complains and seeking feedback from you about our services.***
We will use information you provide to respond to any comments or questions you raise and where appropriate to undertake investigations into any complaints or concerns. On occasion, we may contact you to seek your views on the services we provide.
- ***Holding emergency contact information***
When you join the club, we collect contact details. We also ask you to provide an emergency contact which we only use in exceptional circumstances.
- ***Maintaining attendance registers, achievement records and waiting lists***
 - For health and safety purposes and club records, we need to maintain a register of those in attendance at training or other club activities.
 - Records of achievement relating to proficiency awards, competition, courses will be kept for the purpose of progression and training.
 - If there are no places at the club, we can place you on a waiting list and will contact you using the details you provide to inform you when a place is available.
- ***Entering you into a competition and providing results***
 - If you wish to take part in a club competition, your information (usually your name, date of birth, British Gymnastics and gender) will be used to enter you into the appropriate category and your score will be recorded.
 - If you wish to enter a competition organised by another gymnastics body, including British Gymnastics Association we will provide your information to the organiser to enable you to take part in the competition or event they are organising.
- ***Monitoring performance and undertaking fitness assessments***
If you or your child are/is a [competitive/elite/squad] gymnast, we will need to collect additional information about you/them. We track and monitor gymnast's performance in training, trials and competition and undertake regular fitness assessments. We may require additional information about lifestyle and education if you or your child are/is training at an elite level and requires time out of school or lifestyle.
- ***Collecting additional information to support a participant attending a club trip***
Occasionally we organise residential events or trips. If you or your child registers for one of these events, we will need to collect additional information that may vary dependent on the

specific activities and whether they involve meals and travel. Additional information we require may include passport information and any other relevant information necessary to provide support whilst away from home.

- ***Monitoring the effectiveness of our communications and IT systems***

We monitor whether our electronic communications are received and opened. We also use your IP address to analyse the number of users who are accessing the IT systems at any one time and the types of devices being used. This information helps us to make improvements to our systems and communications. We would not normally use IP addresses to identify individuals except if this is deemed to be necessary to investigate problems or potential misuse of the system.

- ***Responding to your questions, requests and support needs you raise in person or by telephone, email or letter or via our website.***

If you contact us requesting specific information, we will respond to you using the contact information we hold.

We may maintain a log of any important calls, emails and correspondence requesting support on your membership record.

We may compile anonymous statistical reports showing information like the number and type of query and how they have been resolved. Occasionally we will use information provided to develop case studies for learning and development purposes. We will be very careful to ensure that any information that could identify a person will be removed or changed to preserve anonymity.

- ***To monitor that you have completed any required safeguarding training and criminal record checks***

If you undertake a role where a criminal record check and safeguarding training are required, we will receive confirmation from British Gymnastics if your check is approved and that you have completed the required safeguarding training.

- ***Filming for coaching purposes***

On occasion, we may film gymnasts e.g. during a gymnastics session for coaching purposes. Videos taken at training sessions for individual coaching purposes will not be used for any other purpose without prior consent.

- ***Photography and filming to promote club***

- We may take photos in the gym, at events or competitions to promote the club on our website, social media accounts, local papers and in communications. Any images of children will only be published in line with the safeguarding policy.
- **If you do not want your/your child's picture or video to be published, please ensure this is filled out on your club registration form.**
- If we are filming or taking photos for any other purpose, we will ask for your consent.

- ***Running and monitoring our club website and social media***

- Our website and social media are continuously monitored.
- This is the place to get notified about any changes, anything new that's happening and the successes of the gym.

You have a right to object to the use of your information for any purpose we undertake based on legitimate interests. Further information is provided in the section below on individual rights.

You have the right to object to any of the processing we undertake based on legitimate interests based on your own individual circumstances. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, right and freedoms or we need to continue to process your information in connection with a legal claim. If you wish to object to any of the processing activities we undertake based on

legitimate interests please contact us. Please bear in mind that in some cases, if you object this may affect our ability to carry out the tasks above for your benefit.

Consent

We rely on consent in the following circumstances:

- **To use your email or telephone numbers**
- **To take photographs and videos at the club, competition or training for publication.**
With your consent, we may also take photos during training, during competitions or at club events to promote the club on our website, social media accounts, local papers and in communications. All film and photos of children will be published in line with the safeguarding policy.

When you have given us your consent for your personal information to be used for a particular purpose you have the right to withdraw this consent at any time, which you may do by contacting us using the contact details below. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

Special categories of personal data

Special categories of personal data are a category of information that is more sensitive and requires greater protection. Some of the information we process falls into this category (e.g. health/medical data or any information you provide to us about a disability or religion, race or gender identity). It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will only process this type of information if one of the following applies:

- You have given your explicit consent or have made this information public;
- We are required to do so to establish, exercise or defend a legal claim;
- We are required to do so to comply with employment or social security or social protection law;
- There is a substantial public interest in doing so; or
- It is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity.

Marketing

With your consent, we will send information about your activities, services and products that we think might be of interest to you based on your age, interests and experience.

We will send you this information by email.

You can ask us to stop sending you this information at any point by following the instructions in the relevant communication. It may take up to [21 days] for this to take place.

Why we share information about you

We have a legitimate interest in sharing your personal information with British Gymnastics to ensure the sport is safe and well-governed and where relevant to access support and advice.

We may also be required to share your personal information in the following reasons:

- Complying with legal and/or regulatory responsibilities
We may be required to share information with bodies such as Her Majesty's Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner's

Office (ICO). We may also share information with other organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

- Insurance
- Obtaining legal or professional advice
- Obtaining a service from a third party
- All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is strictly necessary to deliver the service.
- We may provide information to any East Midlands Club who is registered with British Gymnastics with information relevant to the transfer of a member.

Except for the above, will only share your information with any third parties with your prior agreement.

How long we keep information about you

We will retain your personal data only as necessary to provide the services to which you have subscribed or where we have another legitimate and lawful reason to do so. At your request or if you do not renew your membership within three years we will delete any information that we no longer have a reason to retain, unless you ask us not to.

We retain some information to comply with legal obligations such as financial/accounting records which need to be retained for six years in line with UK Tax Law.

We need to retain sufficient information about you in the event of an insurance claim in the future so that we can identify you and confirm that you held membership for the relevant period. We may need to retain other information to comply with legal or statutory requirements, some of which are highlighted in this notice. In addition, we may also need to retain information relating to our conduct as part of our regulatory responsibilities, the times of which will vary dependent on the nature of the concern and whether this is any potential risk to others associated with these concerns.

As the reason for retaining certain types of information varies, the retention periods can vary significantly.

Transfers of data out of the EEA

We will not transfer your information to any processors based in other countries outside the EEA unless there is a European Commission adequacy decision for the specific country to which the data is transferred or where we can be certain that there are adequate safeguards provided for your information and individual rights standards that meet the GDPR requirements.

Sometimes our members attend international events on our behalf including festivals, courses, camps and competitions. If members are provided with the opportunity to attend International events, we will collect additional information required to register you for the event and to book accommodation, flights and make other arrangements for the trip. Unless you regularly travel internationally for events, we will delete your passport information immediately after the event.

We may need to submit information about you to the local organiser (generally another international gymnastics or sports federation), such as your date of birth, gender, contact details, club and occasionally your passport details or nationality. Sometimes events may take place outside the European Economic Area (EEA). Although some countries have been approved as having equivalent standards to the protections provided within the EEA, if this is not the case, we will ensure that the international organisation has provided adequate safeguards by way of binding corporate rules or standard data protection contractual clauses or compliance with an approved code of conduct. If on a one-off basis, an event was being hosted in a country where we cannot meet these requirements, we only transfer your information with your explicit consent and where a clear and compelling legitimate interests to do so. Specific details of these transfer will be with the event information.

Individual rights

You have important rights under data protection law. In summary these include:

- **To be informed about how your information is processed**
We hope that the information in our privacy notice has achieved this but please contact us if there is any additional information you require.
- **To have your data rectified if it is inaccurate**
You have the right to access the personal information we hold about you. This is called Data Subject Access Request (DSAR/SAR). You can also request a copy of any information we hold by writing to us using the contact details below.
- **To have you data deleted (except if there is a valid lawful reason to retain it)**
If you do not renew your membership or cease to have a relationship with the club, we will delete any information you provided within three years except for any financial/accounting records which need to be retain for six years in line with the UK Tax Law. Additional information that has been provided solely for the purpose of participating in a specific activity will be deleted after the event.

Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose and in most cases, will be deleted within three years.

Photographs and other video footage captured for promotional purposes will be retained for up to 4 years old. After this time, they will be deleted unless we consider them to be of public interest and should consequently be archived for historical purposes. Where images have been published on social media, these platform providers may continue to process your data after the retention period has lapsed.

Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will contact you and the ICO of any personal data breaches in line with our legal obligations.

Changes to the privacy notice

We keep our privacy notice under regular review. This privacy notice was published on 16th August 2019 and last updated on 16th August 2019.
We may change the privacy notice from time to time, when we do we will inform you via email.