

# **CLUB DATA PRIVACY POLICY**

## 1 About this Policy

- 1.1 This policy explains when and why we collect personal information about our members (and, in some cases, other people who participate in Club events), how we use it, how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website http://www.horshamamphibians.co.uk regularly for any amendments (but amendments will not be made retrospectively).
- 1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.org.uk). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

#### 2 Who we are?

2.1 We are Horsham Amphibians Triathlon (the Club). We can be contacted at http://www.horshamamphibians.co.uk

### 3 What information we collect and why

Type of information	Purposes	Legal basis of processing
Member's name, address,	Managing the Member's	For the legitimate interests of
telephone number, e-mail	membership in the Club,	members in operating the
address	performing administration and	Club.
	providing information in	
	connection with and related to	
	that membership.	
Emergency contact details	Contacting next of kin or other	Protecting the Member's
	nominated persons in the	vital interests and those of
	event of emergency.	their friends, family and/or
		dependants and for the
		legitimate interests of
		members in operating the
		Club.
Photos and videos of members	Putting on the Club's website	For the legitimate interests
and others who participate in	and publications (including the	of members in operating the
Club and external events	Club's newsletter) and social	Club.
	media pages and use in press	
	releases.	
Photos and videos of members	To improve members	For the legitimate interests
who participate in training	performance, technic and	of members in operating the
sessions.	fitness.	Club.
Member's name, address,	Managing race entries and	For the legitimate interests
telephone number, e-mail	race results. Sharing race	of members in operating the
	results with other clubs and	Club.

address and date of birth/age-	the race governing body and	
related information, club	providing race results to print	
affiliations and race times	and online media.	
Member's name, address,	Managing volunteers for Club	For the legitimate interests
telephone number, e-mail	events. Sharing information	of members in operating the
Address Managing volunteers	between volunteers to enable	Club.
for Club events.	effective running of those	
	events. For example, HAT	
	Handicaps and social events.	

### 4 How we protect your personal data

- 4.1 We will not transfer your personal data outside the EU without your consent.
- 4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.
- 4.3 Membership information is stored securely and processed on the Club's behalf by a third party service provider called Membermojo which specialises in sports club membership administration. We have a contract in place with Membermojo that requires them to keep your information secure and not to use it for their own or other purposes. Membermojo's security statement can be found here: https://membermojo.co.uk/mm/security
- 4.4 Southwater Relay information is stored securely and processed on the Club's behalf by a third party service called Results Base which specialises in event services. We have a contract in place with Results Base that requires them to keep your information secure and not to use it for their own or other purposes. Results Base's privacy policy can be found here: <a href="https://www.resultsbase.net/privacy">https://www.resultsbase.net/privacy</a>
- 4.5 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.
- 4.6 For any payments that we take from you online we will use a recognised online secure payment system.
- 4.7 We will notify you promptly in the event of any breach of your personal data, which might expose you to serious risk.

### 5 Who else has access to the information you provide us?

- 5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table above or paragraph 5.2 below.
- 5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters, membership cards etc). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have or will have a contract in place that requires them to keep your information secure and not to use it for their own or other purposes.

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# 6 How long do we keep your information?

- 6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for three months afterwards or, if that is longer, as long as is necessary to comply with our legal obligations. Images constituting personal data may however be retained on websites and other publications. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data (or the relevant part of it) except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.
- 6.2 We destroy securely all financial information once we have used it and no longer need it.

#### 7 Your rights

- 7.1 You have rights under the GDPR:
  - a) To access your personal data
  - b) To be provided with information about how your personal data is processed
  - c) To have your personal data corrected
  - d) To have your personal data erased in certain circumstances\*
  - e) To object to or restrict how your personal data is processed
  - f) To have your personal data transferred to yourself or to another business in certain circumstances.

\*In addition to the rights afforded to you by the GDPR, at the Club's discretion and where practicable to do so, the Club may agree to remove from its website and social media sites images of members or others participating in Club events following receipt of a request to do so.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner: https://ico.org.uk/concerns/

Tel: 0303 123 1113

Address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our club website <a href="http://www.horshamamphibians.co.uk">http://www.horshamamphibians.co.uk</a>

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