activity alliance disability inclusion sport

Privacy notice for our members

We are the English Federation of Disability Sport (EFDS) operating as **Activity Alliance, registered address 3 Oakwood Drive, Loughborough, LE11 1PN.** Registered company no **03627630** ("**we**" or "**our**" or "**us**") want to make sure all the personal information we have collected about you, is safe and secure whether we collect it through our website at <u>www.activityalliance.org.uk</u> ("**Site**") or from other sources. This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store and use your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws [as we not required to do so]. However, our Head of Corporate Services has overall responsibility for data protection compliance in our organisation. If you have any questions about this Policy or what we do with your personal information, their contact details are set out in the "**Contact**" section below.

This privacy policy explains when, why and how we collect personal information before, during and after your relationship with us as a coach, technical official or [referee/umpire] who is working/participating on our events/programmes. It also applies if you are a fan participant or supporter who has contacted us to purchase any merchandise and/or signed up to receive updates about upcoming events, offers and ways to get involved further with us.

We review our Policy regularly, and as such, we may change this Policy from time to time, so please check this page occasionally to ensure that you're happy with any changes.

How we collect personal information from you

We obtain information directly from you when you have registered with us as a coach or an official, or when you contact us to purchase any services or products we offer. We also collect personal information from you when you have signed up with us as a fan participant or supporter to receive updates about upcoming events.

The information we will collect will be necessary personal information throughout the period of you coaching/supporting or officiating with us and when you make a query and/or complaint, or when you correspond with us by phone, e-mail or in some other way.

We may collect your data from third party services which work on our behalf, such as former clubs or other organisations you may have coached at, officiated at a particular event or worked for or via background check agencies.

We also may collect personal information about you from any third party references you provide as part of the application process for becoming a coach, an officiate or from any feedback provided to us about your performance

Data we collect from you

The personal information we collect from you is vital in ensuring you can act as a coach, officiate or participant. The information we may collect from you includes:

- Personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers
- Date of birth
- Gender
- Membership details including start and end date
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us
- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you
- Records of your attendance at any events or competitions hosted by us
- Your marketing preferences so that we know whether and how we should contact you.

Coaches and officials

If you have registered with us you may also provide us with or we may obtain the following additional **personal information** from you:

- Any coaching code or official number
- Your current affiliated club or other organisation (if applicable)
- Coaching/teaching qualification and/or officiating history and any player rating (if any)
- Accreditation/qualification start and end date
- Identification documents such as passport, utility bills, identity cards, etc.

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- Information about your race or ethnicity, religious beliefs
- Information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

This information is required in line with our equality standard.

Legal basis for processing your data

We only process your data on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis
- For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law
- based on your explicit consent

For coaches and officiates, we may also collect criminal records information from you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

Who has access to your information

- We will not sell or rent your information to third parties.
- We will not share your information with third parties for marketing purposes.

Our main server used to store data is located in the UK. Some Third Party Service providers we use to collect or manage personal data, such as Salesforce and SurveyMonkey, may have servers located outside the UK and European Union. In these cases, we will impose any legally required protections to the personal information as required by law before it is disclosed. If you require more details on the arrangements for any of the above then please contact us using the details in the "Contacting us" section below.

We may pass on information to Third Party Services working on our behalf, or that we work in association with, this may include:

- **Providing references to future employers or organisations** you may wish to coach or officiate for.
- To any governing bodies or regional bodies for the sports covered by our club: to allow them to properly administer the sports on a local, regional and national level.
- **Other service providers**: for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers);
- **Our Commercial Partners**: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners.
- **The Government or our regulators**: where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services**: to assist with the investigation and prevention of crime and the protection of national security.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we

hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "**Your rights in relation**" section below.

Uses made of the information

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
All Members		
To administer any	All contact and membership	This is necessary to enable us to
membership account(s) you	details, transaction and	properly manage and administer your
have with us and managing	payment information,	membership contract with us.
our relationship with you,	records of your interactions	
[including arranging for any	with us, and marketing	
insurance] and dealing with	preferences.	
payments and any support,		
service or product enquiries		
made by you		
To arrange and manage any	All contact and membership	This is necessary to enable us to
contracts for the provision of	details.	properly administer and perform any
any merchandise, products	Transaction and payment	contract for the provision of
and/or services.	information.	[merchandise/products/services].
To send you information	All contact and membership	This is necessary to enable us to
which is included within your	details	properly manage and administer your
membership benefits		membership contract with us.
package, including details		
about advanced ticket		
information, [your insurance],		
competitions and events,		
partner offers and discounts		
and any updates on		
To send you other marketing	All contact and membership	Where you have given us your explicit
information we think you	details and marketing	consent to do so.
might find useful or which you	preferences	
have requested from us,		
including our newsletters,		
information about		
Membership, events,		
participation products and		

information about our commercial partners		
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation

Coaches and officials To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction and payment data.	with a safe environment in which to participate in sport. This is necessary to enable us to register you on to and properly manage and administer your
	Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.	development through the course and/or programme.
To conduct performance reviews, managing performance and determining performance requirements	All performance and attendance data and information about your health. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history. Qualification start & end dates. As above.	This is necessary to enable us to properly manage and administer your development through the course and/or programme. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
progression and accreditation status		
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To administer any drug and alcohol testing	Health information	We have a legal obligation and a legitimate interest to provide you &other members of our organisation with a safe environment in which to participate in sport. We process special category personal data on the basis of the "special category reasons for processing of

		your personal data" referred to in section 2 above.
To arrange for any trip or	Identification documents,	This is necessary to enable us to make
transportation to and from an	details of next of kin, family	the necessary arrangements for the
event	members and emergency	trip and/or transportation to the
	contacts, transaction and	event.
	payment information, health and medical information.	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.

Your rights

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "**Contacting us**" section below.

Please note that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information but we will only do this for a time frame that is deemed reasonable. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain benefits to you as a member.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member. We may also be unable to properly perform our arrangements with you or comply with legal obligations and we may have to terminate your position with us.

We will not contact you for marketing purposes unless you have given your prior consent for us to do so by our sign up form on our website, or unless you directly consent for us to do so.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

How long do we keep personal information for?

We won't retain your information for longer than necessary. However, the duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you.

In some cases personal information may be retained on a long-term basis. For example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years (if you are currently volunteering/working with us, this may be for [6] years after you last worked with us).

How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please email us at <u>info@Activityalliance.org.uk</u>, or write us at **3 Oakwood Drive, Loughborough, LE11 1PN**, or telephone **01509 227 750**.

In most circumstances Data Subject Access Requests will be provided free of charge. However, Activity Alliance are permitted to charge a "reasonable fee" when a request is manifestly unfounded, excessive or repetitive. This fee will be based on the administrative cost of providing the information.

Review to this notice

We keep this Policy under regular review. When we review this notice, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

Contacting us

In the event of any query or complaint in connection with the information we hold about you, questions regarding our policy and privacy practices please email <u>info@Activityalliance.org.uk</u> or write to us at **3 Oakwood Drive, Loughborough, LE11 1PN**, or telephone **01509 227 750**.

Whilst this privacy policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on <u>the Information Commissioner's website</u>.

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