

EAST ESSEX TRIATHLON CLUB (EETC)
PRIVACY NOTICE FOR OUR MEMBERS AND RACE ENTRANTS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect either:

- before, during and after your membership with us, or
- when you enter one of the races organised by East Essex Triathlon Club.

This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this privacy notice refer to East Essex Triathlon Club (hereafter, 'EETC').

We have appointed the **EETC Treasurer** to oversee our compliance with data protection laws. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU - EETC MEMBERS (ADULTS AND CHILDREN)**

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- profession;
- school;
- 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 hosted by us;
- details of Triathlon England membership;
- details of next of kin, family members, coaches and emergency contacts;
- records of any rankings, grading or ratings, and competition results;
- any disciplinary and grievance information.

2. **PERSONAL INFORMATION WE MAY COLLECT FROM YOU - RACE ENTRANTS**

Depending on the type of race you enter with us, you may initially provide us with **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- 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 hosted by us;
- details of Triathlon England membership;
- details of next of kin, family members, coaches and emergency contacts;
- records of any rankings, grading or ratings, and competition results;

3. **SPECIAL CATEGORIES OF PERSONAL INFORMATION - MEMBERS AND RACE ENTRANTS**

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

- information about your health, including any medical condition relevant to the sport.

In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

For certain **members**, we may also collect criminal records information about you, especially where you act as a coach for the club and/or have prolonged contact with children. For criminal records history we process it on the basis of our legal obligations and is based on your explicit consent.

4. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members and race entrants via a third party website (Entry Central), who process this information on our behalf. Details of Entry Central’s compliance with Data Protection Laws can be found at the bottom of this page, and the Treasurer has confirmed that their compliance statement is in line with current legislation.

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 to personal information” section below.

5. **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
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us.
To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, offers and discounts and any updates on Triathlon	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.

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.	<p>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 run our club and in some cases we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 3 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
For the purposes of promoting the club, 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, and medical information about your health	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 3 above.</p>
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.	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 3 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.

		<p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 3.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

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 or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

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 however 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 to the extent that we are entitled to do so on bases other than your consent. 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 member benefits to you.

6. DIRECT MAILING

Email, post and SMS contact:: from time to time, we may contact you by email, post or SMS with information about events, races or related services we believe you may be interested in.

We do not provide your contact details to any third party.

We will only send messages if we believe they will be of genuine interest to you and won't cause a nuisance; we follow the guidance set out by the Information Commissioner's Office.

You can then let us know at any time that you do not wish to receive messages by informing our data compliance official [see section 12].

7. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **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; this includes Triathlon England and England Athletics.
- **Our service providers:** in particular, Entry Central (for membership applications and management) and Race Director Software (for processing chip timing results where we use our kit) and StuWeb (for processing chip timing results using their own software and hardware). Please note that this list is not exhaustive.
- **Our supply chain partners,** such as when requesting personalised Club Kit.
- **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.

8. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect (and processed by our authorised third parties) is **not** transferred to and stored in countries outside of the UK and the European Union.

9. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

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. However, 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 six years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You can contact us by using the details set out in the "**Contacting us**" section below.

10. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice 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 the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

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.

11. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, 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.

12. **CONTACTING US**

In the event of any query in connection with the information we hold about you, please email paul.gibbon@east-essex-tri-club.co.uk

The EETC Membership Secretary can be contacted here membership@east-essex-tri-club.co.uk

Entry Central's GDPR Compliance statement can be found here <https://www.entrycentral.com/terms-and-conditions>

Version dated 15 July 2018