



**S.G.C.**

Stevenage Gymnastics Club

# Stevenage Gymnastics Club Privacy Notice

Stevenage Gymnastics Club (“The Club”) understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of everyone who visits our websites and supplies us with information. We only collect and use your personal data as described in this Privacy Policy. Any personal data we collect will only be used as permitted by law in the role of Data Controller.

Please read this Privacy Policy carefully and ensure that you understand it.

We have a separate notice which provides privacy information relating to employees.

## **Information About Us**

Our members are gymnasts or parents (if the gymnast is a child). We provide the opportunity for our members to participate in our activities, which include recreational classes, school holiday workshops, displays and other similar gymnastics activities.

We register with the Independent Gymnastics Association (IGA), who provide insurance for clubs and individual members.

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.

## **What Is Personal Data?**

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the “GDPR”) and the Data Protection Act 2018 (collectively, “the Data Protection Legislation”) as ‘any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier’.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

## **What Are My Rights?**

Under the Data Protection Legislation, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Policy should tell you everything you need to know, but you can always contact us to find out more or to ask any questions.
- b) The right to access the personal data we hold about you.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete.



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- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we hold.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to withdraw consent. This means that, if we are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.
- h) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- i) Rights relating to automated decision-making and `profiling. We do not use your personal data in this way. For more information about our use of your personal data or exercising your rights as outlined above, please contact us.

It is important that your personal data is kept accurate and up-to-date. If any of the personal data we hold about you changes, please keep us informed as long as we have that data. Further information about your rights can also be obtained from the Information Commissioner's Office or your local Citizens Advice Bureau.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office. We would welcome the opportunity to resolve your concerns ourselves, however, so please contact us first to discuss any concerns.

### **Why do we hold information about you or your Child?**

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, gymnastics classes, displays 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 required.

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 activity and to keep you/them safe while participating. Some individuals may be at risk of harm from participating in gymnastics activity 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 gymnastic 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.



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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 or your child's needs. We will keep a record of any steps we take to support inclusion.

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 the following purposes:

- **Responding to communications, concerns or complaints and seeking feedback from you about our services.**

We will use the 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 will only use in exceptional circumstances if we are unable to contact your primary contact e.g. a parent.

- **Maintaining attendance registers, progress reports 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. We also maintain records of progress against an award scheme and contact details (including date of birth) of those children on our waiting list.

- **Collecting additional information to support a participant attending a club trip**

Occasionally we may 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.

- **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 the club**

We may take photos in lessons or at club events to promote the club on our website, club social media account and in communications. Any images of children will be published in line with our safeguarding policy.

You can let us know (via the Membership form) if you do not wish for your Child to be filmed or photographed or do not want their image to be published. While we can usually take steps to prevent you from being photographed or filmed at small club events, please bear in mind that at our large public events, it may be difficult to avoid capturing you in footage. However, we always review all photographs prior to publication and we will ensure any images of you are deleted.



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We have carried out an assessment to ensure that the above processing is necessary and is carried out in a way that ensures a balance between the club's interests and your individual interests, rights and freedoms with appropriate safeguards, especially to protect the interest of data subjects who are children. We can provide details of these assessments on request.

You have a right to object to the use of your information for any purposes we undertake based on legitimate interests.

### **What Personal Data Do You Collect and How?**

The categories of personal information we process includes:

- Contact details (gymnast or parent and emergency contacts)
- 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.

Other information which we may process can include:

- Any individual risk assessments (gymnasts and others if applicable)
- Details of any reasonable adjustments or steps taken to support your individual needs
- IGA membership details
- Gymnast attendance and achievement records
- Any communications from, to or relating to you or your child
- Details relating to standards of conduct
- Any accident or incident reports including details of injuries
- IP address, browser identifier and the time of access (if you use our website)
- Bank details (If you are making regular payments to us or we are making payments to you)
- Experience, qualifications, training and confirmation that you have completed a criminal record check (prospective or existing volunteers).

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.

### **How Do You Use My Personal Data?**

Where we collect any personal data, it will be processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the Data Protection Legislation at all times. We will not share any of your personal data with any third parties for any purposes other than storage on an email / web hosting server and with our insurance company when required.

### **How and Where Do You Store My Data?**

Your data is stored on the Cloud and in paper form in the Gym. All paper information is locked away at the end of each session and only accessed by the Senior members of SGC.



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### **Consent**

We rely on consent to take photographs and videos of your Child at our lessons or displays if we intend to use them for publication.

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.

### **Do You Share My Personal Data?**

We will not share any of your personal data with any third parties for any purposes, subject to the following exceptions. We are required to share details with our insurance company in the event of a claim. In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

### **How Can I Access My Personal Data?**

If you want to know what personal data, we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”. All subject access requests should be made in writing and sent to the Club email address. There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within 28 days and, in any case, not more than one month of receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date we receive your request. You will be kept fully informed of our progress.

### **How Do I Contact You?**

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the Club email address of [www.steveangegymnasticsclub.co.uk](mailto:www.steveangegymnasticsclub.co.uk)

### **Changes to this Privacy Policy**

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes will be immediately posted on our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.

This Privacy Policy was last updated in April 2023.