

# Data Protection Policy

*...putting you in control of your data*





# Introduction

- On the 25 May 2018, the General Data Protection Regulations are introduced. This means a far reaching change to your rights and our responsibilities. The club has carried out an extensive data audit of what data we hold about club members and members of the public that may enter events that the club organises and how this data is processed. The clubs board of management have taken the decision to act in the true spirit of the regulations and place you the member in control of your data. This document details:
  - What data we hold on you.
  - How we process it.
  - Your rights under the regulations.
  - How we give you control on how we process your data.
  - Our commitment to handling your data in a fair and transparent manner.
  - Our data protection principles.



# Data held on members

Athlete Name	Athlete Address	Athlete Gender	Athlete Date of Birth	
Athletes or parents phone number	Athletes or parents email address	Parent Name	EA Affiliation status	EA number
Emergency contact Name, relationship, Tel	Medical Conditions	Continuous membership from year	Preferred events	Volunteer preference
Payment details Date paid / cleared amount	Travel arrangements for child	Athlete Training performance & attendance		

Key:

Held for all members

Held for juniors

Considered special category PII



# Data held on competitors

Athlete  
Name

Athlete  
Gender

Athlete  
Date of Birth

Athletes email  
address

Age on day of  
race

EA number

EA Affiliation  
status

Athletes club

Key:

Held for all  
members

# Processing of your data



- Under the regulations, processing is defined as the recording, organisation, storage, adaption or alteration and transmission of your data.
  - Your data is recorded via our online membership portal, events portal or paper form which are then transposed to one of these electronic storage.
  - All personal identifiable information is stored using a 128 bit cipher, called advanced encryption standard on our servers which was originally developed to store classified information . We hold no PII in an unencrypted form.
  - Your performances (times, positions) in our events may be altered by application of handicap, in a handicap event, converted into points in a points based competition, or added in a multi event competition.
  - Your training attendance and performance data may be compared, analysed or aggregated for the purposes of identifying gaps in training, identifying effect training techniques and ways to improve training, compiling overall attendance figures.

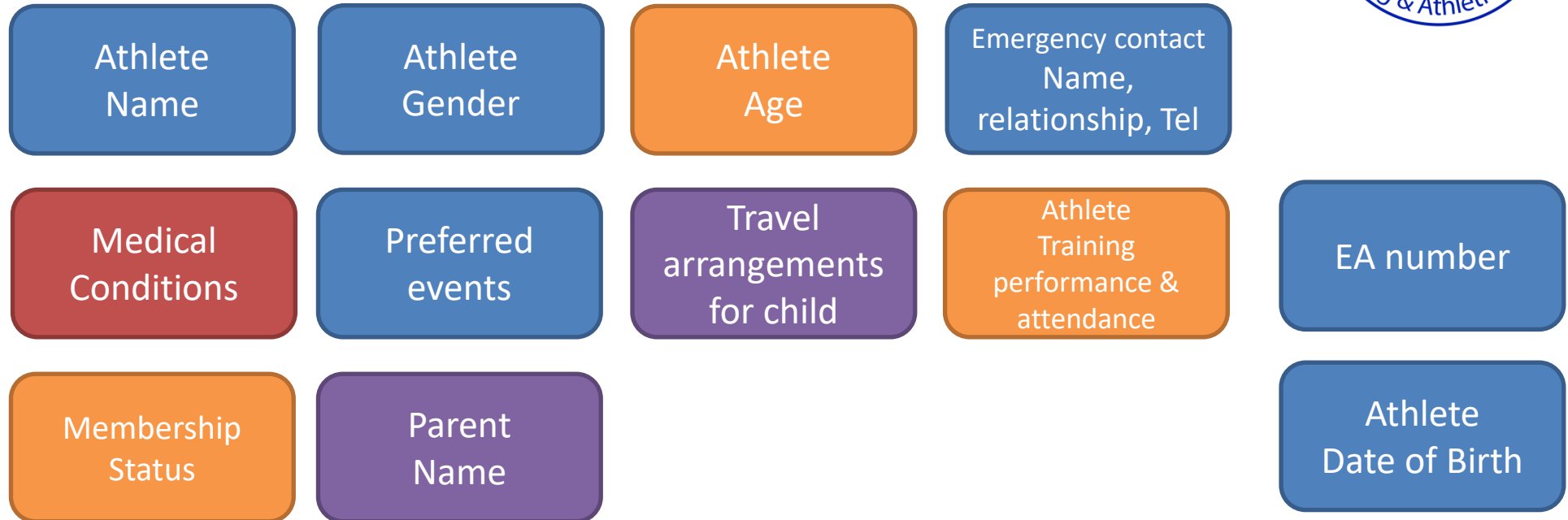
# Processing of your data



- Your competition data may be compared, analysed or aggregated for the purposes of producing overall positions, age category positions, handicap positions, multi event positions and overall event statistics.
- PII may be shared via secure means with coaches, team managers and other officials, as set out in later sections for the purposes of providing safe athletics training and competition environment, entering teams, keeping you informed.
- PII may be transmitted as set out in later sections to third parties, for the purposes of registration with the sports governing body, entry into a competition, ensuring your safety in an emergency situation
- PII may be transmitted as set out in later sections to third parties gathered in our events, for the purposes of leagues, local and national rankings, publication of results.



# Data shared with coaches



Key:

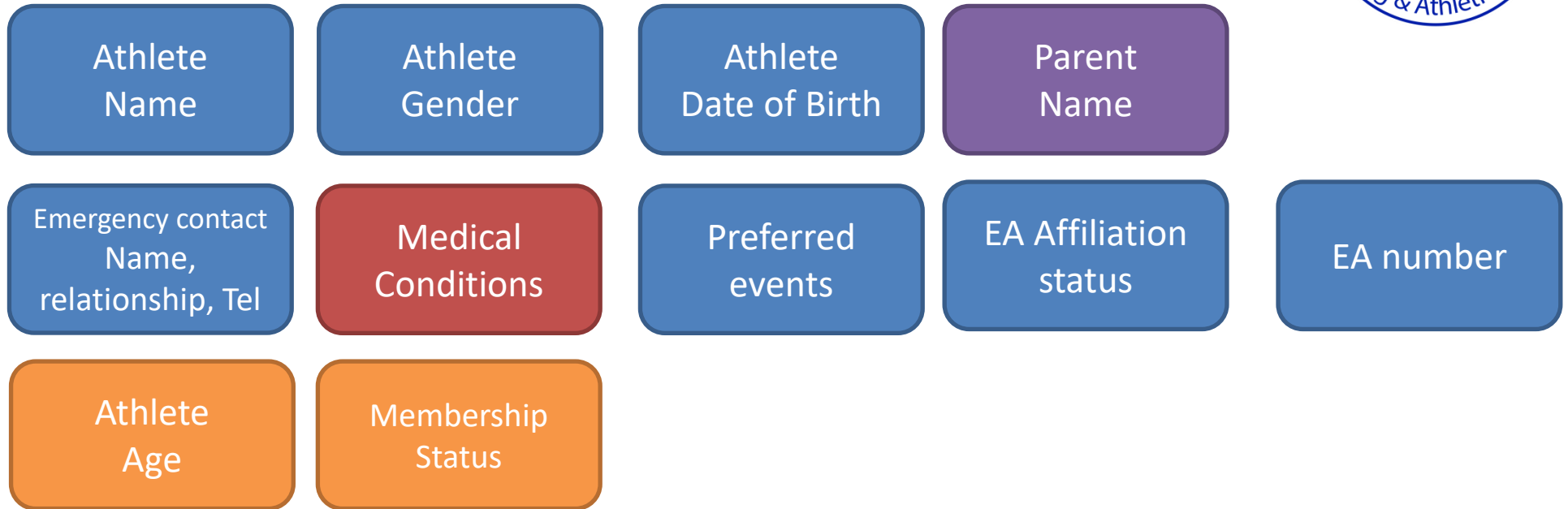
Held for all members

Held for juniors

Considered special category PII

Adapted

# Data shared with Team managers



Key:

Held for all members

Held for juniors

Considered special category PII

Adapted



# Data shared with other officers



Athlete  
Name

Preferred  
events

Volunteer  
preference

Membership  
Status

Key:

Held for all  
members

Adapted



# Data transmitted to EA

Athlete  
Name

Athlete  
Address

Athlete  
Gender

Athlete  
Date of Birth

Athletes or  
parents phone  
number

Athletes or  
parents email  
address

Parent  
Name

Membership  
Status

Key:

Held for all  
members

Held for  
juniors

Adapted



# Data transmitted to competition promoters

Athlete  
Name

Athlete  
Gender

Athlete  
Date of Birth

EA Affiliation  
status

EA number

Key:

Held for all  
members



# Data transmitted to leagues & Power of 10

Athlete  
Name

Athlete  
Gender

EA number

Athlete  
Age

Athlete  
Position

Athlete  
Time

Key:

Held for all  
members

Adapted



# Data transmitted Publications

Athlete  
Name

Athlete  
Gender

Athlete  
Age

Athlete  
Time

Athlete  
Position

Key:

Held for all  
members

Adapted



# Data held to contact you but not shared

Athlete  
Name

Athlete  
Address

Athletes or  
parents phone  
number

Athletes or  
parents email  
address

Parent  
Name

Key:

Held for all  
members

Held for  
juniors



# Data held for setting rates

Athlete  
Name

Athlete  
Gender

Athlete  
Date of Birth

EA Affiliation  
status

Continuous  
membership  
from year

Payment details  
Date paid /  
cleared amount

Key:

Held for all  
members

# Your rights under the regulations



- Under the regulations you have the following rights:
  - Right to be informed about the collection and use of your data
    - This documents informs you transparently how we collect and use your data
  - Right to access
    - Our member portal allows you to view all the data we hold on you.
  - Right to rectification
    - Our member portal gives you the ability to rectify inaccurate data we hold.
  - Right to erasure
    - We will erase all personal data within 28 days of you informing us of your resignation as a member unless we are required to hold it for legal purposes. Upon a legal obligation no longer existing we will erase it within 28 days.
  - Right to restrict processing
    - We provide you the ability through our member portal to restrict sharing with coaches and team managers by selecting you coaching and teams.
  - Right to data portability
  - Right to object
    - You have the right to object to receiving emails from us and can do this via the unsubscribe method or removing yourself in the member portal.



# How we give you control



- Sharing of your data

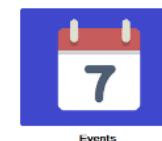
- We share your data internally, with coaches, and team manager, however you have control which coaches and team managers can access your data. You can do this by selecting the coaching sessions, or teams you wish to participate in.
- To do this login to members portal, for coaching select 'Coaching'
- You will then be presented with a list of available
- The coaches who take that session and can access your data are listed besides. If you attend the session ,please select the session by clicking the selection toggle, it will turn green. If you are no longer attending please click so turns grey.



## Available training sessions

Session Name	Coach Name	Day	Time	Type	Athlete	Selected
U14s 365 Multi Event	Christopher Hitchman, Jessica Cox, David Ashbourne	Tue	6-7pm	365 Multi Event	Christopher	<input type="checkbox"/>

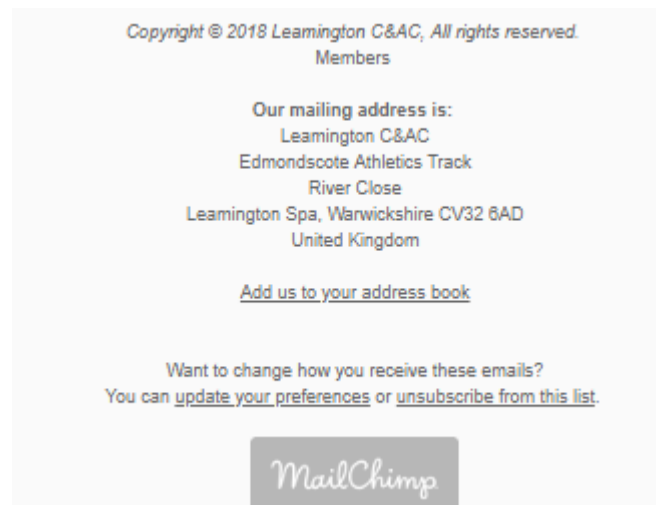
- For teams please select 'Events'
- You will be presented with a similar list of teams and events
- The team manager is named alongside. Follow the same procedure





# How we give you control

- Emails
  - For emails from coaches and team managers, we will no longer share with them your email address. Instead they will have access to a mailchimp mailing list, fed by our membership system. If you remove yourself from a training group or team you will be automatically removed from this mailing list. You can also unsubscribe from the list directly in the mail, but this may mean you do not receive important information from your coach or team manager.
  - For general club communications, you can change your mail preferences, and unsubscribe using the options directly in the email as shown below



# Our commitment to handling your data in a fair and transparent manner



- ensuring that we comply with the eight data protection principles, as listed below
- meeting our legal obligations as laid down by the Data Protection Act 1998 and General Data Protection Regulations
- ensuring that data is collected and used fairly and lawfully
- processing personal data only in order to meet our operational needs or fulfill legal requirements
- taking steps to ensure that personal data is up to date and accurate
- establishing appropriate retention periods for personal data
- ensuring that data subjects' rights can be appropriately exercised
- providing adequate security measures to protect personal data
- ensuring that a nominated officer is responsible for data protection compliance and provides a point of contact for all data protection issues
- ensuring that all club officers are made aware of good practice in data protection
- providing adequate training for all staff responsible for personal data
- ensuring that everyone handling personal data knows where to find further guidance
- ensuring that queries about data protection, internal and external to the organisation, are dealt with effectively and promptly
- regularly reviewing data protection procedures and guidelines within the club



# Our data protection principles

- Personal data shall be processed fairly and lawfully
- Personal data shall be obtained for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed
- Personal data shall be accurate and, where necessary, kept up to date
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes
- Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998 and General Data Protection Regulations
- Appropriate technical and organisational measures shall be taken against unauthorised and unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data