**Dragons Trampoline Club Privacy Notice – Members and Volunteers**

Dragons Trampoline Club is the data controller and is committed to complying with our legal responsibilities under data protection law. We take your privacy seriously and will ensure your personal information is kept secure.

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.

This notice applies to you if you are:

* An existing or prospective member of our club;
* A person with parental responsibility for a member;
* An existing or prospective club volunteer or official;

**It is important that you read this carefully as it contains key information about how we use your personal data and your associated rights.**

**About us**

Dragons Trampoline Club is a ‘not for profit’ membership organisation. Our members are gymnasts or the parents (if the gymnast is a child) and volunteers who help with the running of the club providing coaching, judging, competition officiating duties and club committee officer duties. We provide the opportunity for our members and volunteers to participate in our activities, which include recreational and competition classes, competitions, squads and other similar gymnastics activities.

We register with British Gymnastics who governs the sport, provides insurance for clubs and individual members and offers competitions and events. It is a condition of British Gymnastics club registration that all our club members also register as individual members of British Gymnastics.

We also affiliate to Trampoline East, Eastern Counties Gymnastics Association and Norfolk Gymnastics Association who run competitions and events in which we may participate. We also compete at the Trampoline and DMT League competitions but are not affiliated to this organisation.

**Information we collect about you**

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.

British Gymnastics collects the above information on our behalf when you join or renew your British Gymnastics membership.

* Any individual risk assessments (gymnasts and others if applicable)
* Details of any reasonable adjustments or steps taken to support your individual needs
* British Gymnastics membership details\* (which are confirmed by British Gymnastics when you join or renew)
* Gymnast attendance and achievement records
* Any communications from, to or relating to you
* 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 e.g. for volunteer expenses)
* Experience, qualifications, training and confirmation that you have completed a criminal record check (prospective or existing volunteers).

The information marked with an \* above is essential for us to provide your membership. It is your choice whether you provide all the information we have requested but not providing information may affect our ability to meet you or your child’s needs and to protect their well-being.

If you are a competitive gymnast, we record other information about you to support your training and participation in competition such as:

* Training and technical information
* Lifestyle information
* Nationality (if you are competing at international level)

**Our purposes for processing information about you**

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, competitions, or 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.
* To provide you with the benefits and services to which you have subscribed.
* To enable us to purchase award certificates

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 due to 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.

If you are selected for a role at the club, we will usually obtain a reference from any appropriate organisation or individual you have nominated.

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.

If you are wishing to volunteer for us, we will need to ask you to complete a criminal record check as we have a legal obligation to do so. We jointly control the checking process with British Gymnastics who is responsible for the assessment of any content on the check and will only share information with us where it is appropriate. For example, if you are considered by British Gymnastics to be unsuitable to take on the role, British Gymnastics may share relevant and proportionate information about criminal offences, if it is considered necessary for safeguarding purposes.

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, achievement records (for progress against an award scheme or competitive pathway) 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.

If there are no places in the club, we can place you on our waiting list and will contact you using the details you provide to inform you when a place is available.

* **Entering you into a competition and providing results**

If you wish to take part in a club competition, your information (usually your name, date of birth and gender) will be used to enter you into the appropriate category and your score will be recorded. Results of competitions are normally published on our website and social media account.

If you wish to enter a competition organised by another gymnastics body, including British Gymnastics, Regional Gymnastics Association and Trampoline & DMT League we will provide your information to the organiser to enable you to take part in the competition or event that they are organising.

* **Monitoring performance and undertaking fitness assessments**

If you or your child are/is a competitive/elite/squad gymnast, we will need to collect additional information about you/them. We track and monitor gymnast’s performance in training, trials and competition and undertake regular fitness assessments. We may require additional information about lifestyle and education if you or your child are/is training at an elite level and requires time out of school or lifestyle.

* **To monitor that you have completed any required safeguarding training and criminal record checks**

If you undertake a role where a criminal record check and safeguarding training are required, we will receive confirmation from British Gymnastics if your check is approved and that you have completed the required safeguarding training.

* **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 at club events to promote the club on our website, club social media account and in communications with club members. Any images of children will be published in line with our safeguarding policy.

Let us know if you do not wish to be filmed or photographed or do not want your 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.

If we are filming or taking photos for any other purpose, we will ask for your consent.

* **Running and monitoring our club website**

We use Cookies on our website. Cookies are small pieces of data stored on a site visitor’s browser which are used to keep track of movements and actions on a site. We will monitor how our website is used by tracking the articles that you open and how you move around the site. This will help us to understand what information is most useful and helps to improve the site. There are two types of cookies. Session (Transient) Cookies which are erased when you close your browser, and do not collect information from your computer. They typically store information in the form of a session identification that does not personally identify the user. The second type of cookie is a Persistent (Permanent or Stored) Cookie which is stored on your hard drive until it expires. These cookies are used to collect identifying information about the user, such as web surfing behaviour or user preferences for a specific site. The cookies we use on our site are detailed in the table below:

|  |  |  |
| --- | --- | --- |
| **Cookie Name** | **Life Span** | **Purpose** |
| svSession | Persistent | Communication between website owner and visitor |
| hs. | Session | Security |
| XSRF-TOKEN | Persistent | Security |
| smSession | Persistent (2 weeks) | Identifies logged in site members |
| TSxxxxxxxx (where x is replaced with a random series of numbers and letters | Persistent | Security |
| TSxxxxxxxx\_d (where x is replaced with a random series of numbers and letters) | Persistent | Security |

We have carried out a legitimate interest assessment (LIA) 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. Further information is provided in the section below on individual rights.**

**Consent**

We rely on consent in the following circumstances:

* **To use your email or telephone numbers for marketing purposes.**
* **To take photographs and video for any other purpose other than the legitimate interest reasons detailed above**.

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. If you provided (any) consent(s) for a specific purpose as part of the information you provided on our behalf through the British Gymnastics membership platform, this (these) consents can be withdrawn at any time by logging into your British Gymnastics account. You also need to inform Dragons Trampoline Club of this action so we can update your consent details. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

**Special categories of personal data**

Special categories of personal data are a category of information that is more sensitive and requires greater protection. Some of the information we process falls into this category (e.g. health/medical data or any information you provide to us about a disability or your religion, race or gender identity). It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will only process this type of information if one of the following applies:

* You have given your explicit consent or have made this information public;
* We are required to do so to establish, exercise or defend a legal claim;
* We are required to do so to comply with employment or social security or social protection law;
* Legitimate activities of a ‘not for profit’ organisation;
* There is a substantial public interest in doing so; or
* It is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity.

**Marketing**

With your consent, we may send you information about our activities, forthcoming events, services, products and merchandise that we think might be of interest to you. We may send you this information by email.

You can ask us to stop sending you this information at any point by responding to the relevant communication with the word ‘STOP’ or by following the instructions in the relevant communication. It may take up to 21 days for this to take place.

**Why we share information about you**

We have a legitimate interest in sharing your personal information with British Gymnastics to ensure the sport is safe and well-governed and where relevant to access support and advice.

We may also be required to share your personal information in the following reasons:

* Complying with legal and/or regulatory responsibilities

We may be required to share information with bodies such as Her Majesty’s Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner’s Office (ICO). We may also share information with other organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

* Insurance
* Obtaining legal or professional advice
* Obtaining a service from a third party

All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is strictly necessary to deliver the service.

Except for the above, we will only share your information with any other third parties with your prior agreement.

**Transfers of data out of the EEA**

We may transfer your personal information to countries which are located outside the European Economic Area (EEA) for the follow purposes:

* To United States in order to provide cloud storage. This service is provided by Google who are certified as adhering to the EU-US Privacy Shield. For more information please see Google’s Privacy Policy. https://policies.google.com/privacy

We will not transfer your information to any other country or organisation outside the EEA unless there is a European Commission adequacy decision for the specific country to which the data is transferred or where we can be certain that there are adequate safeguards provided for your information and individual rights standards that meet the GDPR requirements.

Please contact us using the contact details in this notice if you would like further information about why transfers to the above countries are permitted under GDPR.

**Individual rights**

You have important rights under data protection law. In summary these include:

* **To be informed about how your information is processed** (set out above)
* **To access any personal data held about you**

You have the right to access the personal information we hold about you. You can log in to ‘My Account’ on the British Gymnastics website at any time to view/amend/delete the information we hold about you that has been collected by the British Gymnastics system. If you do amend or delete any information on the British Gymnastics system please could you also inform us by using the club contact details below. You can also request a copy of any other information we hold by writing to us using the contact details below.

* **To have your data rectified if it is inaccurate**

If you think that any of the information we hold is inaccurate, you can ask that corrections are made. We will either make the requested amendments or provide an explanation as to why we are not making changes

* **To have your data deleted (except if there is a valid lawful reason to retain it)**

If you do not renew your membership or cease to have a relationship with the club, we will delete any information you provided within two years except for any financial/accounting records which need to be retained for six years in line with UK tax law. Additional information that has been provided solely for the purpose of participating in a specific activity will be deleted after the event.

Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose and in most cases, will be deleted within 2 years.

Photographs and other video footage captured for promotional purposes will be retained for up to 4 years. After this time, they will be deleted unless we consider them to be of public interest and should consequently be archived for historical purposes. Where images have been published on social media, these platform providers may continue to process your data after the retention period has lapsed.

You have a right to request the deletion of your information in advance of the above retention periods. We will delete this information unless there is a lawful reason for the information to be retained.

* **To have your information restricted or blocked from processing**

If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.

* **To portability**

If you wish to move to another club, you can transfer your information to another club registration by logging into ‘My Account’ on the British Gymnastics system. Alternatively, if you wish to leave the club, the information you provided on behalf of our club will be archived on the British Gymnastics system for 60 days and will be deleted after this has lapsed. During this period, you can transfer your information to another club. This may be limited to your club membership

* **To object to:**
* **Any processing based on legitimate interests**

The right to object is specific to the data subject’s particular situation. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, rights and freedoms or we need to continue to process your information in connection with a legal claim. Please contact Dragons Trampoline Club using the contact details below to ask for an objections form or alternatively please visit the Dragons Trampoline Club website, [www.dragonstrampolineclub.co.uk](http://www.dragonstrampolineclub.co.uk) to download an objections form.

* **Your personal information being used for direct marketing activities**

You can object to our direct marketing activities by unsubscribing from the relevant communication as described above in the marketing section of this notice.

To learn more about your rights visit the Information Commissioner’s Office website, [www.ico.org.uk](http://www.ico.org.uk)

To exercise any of your rights or if you have any questions about our privacy notice please contact:

Rachel Parker at Dragons Trampoline Club, Deer Park House, Bawburgh Road, Easton, Norwich, NR9 5EA.

Email - dragonstrampolineclub@gmail.com

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR or have any wider concerns about our compliance with data protection law. You can do so by calling the ICO helpline on 0303 123 1113 or via their website, www.ico.org.uk

**Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine reason to need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will inform you and the ICO of any personal data breaches in line with our legal obligations.

**Changes to the privacy notice**

We keep our privacy notices under regular review. This privacy notice was published on 20-07-2018 and last updated on 20-07-2018.

We may change this privacy notice from time to time, when we do we will inform you via our facebook page, email and by putting a notice on our club notice board.