

THANET PRIMARY ASSOCIATION FOR SCHOOL SPORT PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your involvement with us. 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.

This notice applies to you if you are either:

1. an individual or club member who has contacted us to receive updates about upcoming event information and other ways to get involved further with primary school sport in Thanet; or
2. a participant at one of our events or meetings; or
3. a school employee who has asked to receive updates; or
4. an individual or club member whose services we use.

References to **we, our or us** in this privacy notice are to the **Committee of The Thanet Primary Association for School Sport, including the School Games Organiser and The Ursuline College**

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Administrator has overall responsibility for data protection compliance in our organisation. 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

You may provide us with or we may obtain **personal information** about you, such as information regarding your:

- o personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- o date of birth;
- o gender;
- o records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- o Details you provide about your experience in the sport and your interests in getting further involved in the sport;
- o any feedback you provide in a survey;
- o records of your attendance at any events, competitions or workshops delivered by us or our sports partners;
- o images in video and/or photographic form and voice recordings;
- o any payment or bank details you provide so that we can receive payments from you or you can receive funding from us and details of the financial transactions with you;
- o use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- o any funding application details; and
- o your marketing preferences so that we know whether and how we should contact you.

2. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information when you sign up for our Update, or enter one of our events; or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you when you attend one of the events or meetings hosted by us or one of our delivery partners and/or activity providers.

3. 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 account you have with us and managing our relationship with you, including dealing with enquiries made by you	All contact details, records of your interactions with us.	This is necessary to enable us to properly manage and administer your account with us.
To send you our Update and information about our events and any offers from/about our partners and activity providers to further progress your interest in the sport	Contact details Details you provide about your experience in the sport and, your interests in getting further involved in the sport;	Where you have given us your explicit consent to do so.
To deal with 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 the service we provide.
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 any account you have with us and in some cases we may have legal or regulatory obligations to retain records.
To conduct data analytics studies to better understand event attendance and trends within sport in the District	Records of your attendance at any events or competitions hosted by us and/or our delivery partners.	We have a legitimate interest in doing so to ensure that our events continue to improve and are targeted and relevant.
For the purposes of promoting sport in the District, our events and the work we do.	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 health and medical information	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.
To administer your attendance at any courses, events or programmes you sign up to	All contact details.	This is necessary to enable us to register you on to and arrange for the effective delivery of our development programmes and events.
To arrange and manage contracts for the provision of services/products	Transaction and payment data, contact details	This is necessary to enable us to properly manage and perform any contract for services and products.

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 of our body or we may not be able to properly perform our duties with you or comply with legal obligations and we may have to terminate your position as a member of our body. 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 duties 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 benefits to you.

4. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you;**
- **To any governing bodies or regional bodies for the sports covered by us:** to allow them to properly administer the sports on a local, regional and national level.
- **Other service providers and advisors:** for example, The Ursuline College finance department;
- **External funding providers:** for the purposes of allocating grants and sponsorship;]
- **Our Partners and Activity Providers:** for the purposes of providing you with information on any special offers, opportunities, products and services and other commercial benefits provided by our commercial partners where you have given your express for us to do so and/or for the purposes of arranging any events or workshops you have registered your interest in;
- **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.

We do not disclose personal information to anyone else except as set out above.

5. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

6. **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 6 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, 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.
- Information that may be relevant to projects that we fund may be retained for longer periods in order to allow us to assess the longer-term impact of our support for sports projects.

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.

7. SECURITY

We take the privacy and security of individuals and their personal information very seriously and take every reasonable measure to protect and secure the personal data that we process. To this end:

- We password protect documents and databases containing personal data on computers which are in turn kept in a secure location
- We do not take personal data out of the organisation's premises (unless absolutely necessary).
- We never leave any items containing personal data unattended in a public place, e.g. on a train, in a café, etc. This includes paper files, mobile phone, laptops, tablets, memory sticks etc.
- We never leave any items containing personal data in unsecure locations, e.g. in car on a drive overnight.
- We shred any papers containing personal data and dispose of any materials containing personal data securely, whether the materials are paper based or electronic.
- We do not transfer personal data to any third party without prior written consent.

8. 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.

9. 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.

10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email gary.rees@tinyonline.co.uk or write to us at 12 Linden Avenue, Broadstairs, Kent CT10 1HR