



# Privacy Notice

## Joe Fraser Gymnastics

### 1. Overview

1.1 Joe Fraser Gymnastics 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.

1.2 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.

1.3 This policy should be read in conjunction with British Gymnastics and Joe Fraser Gymnastics health and safety policies and welfare and safeguarding policies.

### 2. Scope

2.1 This notice applies to you if you are:

- An existing or prospective member of our club.
- A person with parental responsibility for a member or an individual attending the premises.
- A contractor, supplier or contact of the business.
- An existing or prospective club volunteer, official or employee

2.2 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.

### 3. Information Joe Fraser Gymnastics and British Gymnastics collect about you

3.1 The categories of personal information we process includes:

3.1.1 Contact details (gymnast or parent and emergency contacts)

3.1.2 Gymnast date of birth

3.1.3 Gymnast gender

3.1.4 Any relevant medical conditions and/or disabilities and additional related information

3.1.5 Other relevant individual needs for example, information about learning, religious or other support needs.

3.1.6 Details of any reasonable adjustments or steps taken to support your individual needs

3.1.7 British Gymnastics membership details

3.1.8 Gymnast attendance and achievement records

3.1.9 Any communications from, to or relating to you

3.1.10 Details relating to standards of conduct

3.1.11 Any accident or incident reports including details of injuries

3.1.12 Website cookies which may include IP address, browser identifier and the time of access (if you use our website)

3.1.13 Bank details for direct debit payments

3.1.14 Experience, qualifications, training and proof of DBS (prospective or existing volunteers).

3.1.15 Dietary requirements and any other relevant information that we need to know to ensure your needs are met;

3.1.16 CCTV images and video of any individuals attending the premises at Unit 1-2 Shires Industrial Estate, Lichfield, WS14 9AZ.

#### 4. Our purposes for processing information about you

4.1 We use the information we hold about you for a variety of purposes. Data protection law requires us to tell you what our legal reason is for each purpose.

4.2 Contractual purposes. When you ask us to provide you a service, such as club membership, gymnastics classes, competitions, trips or other activities we usually need to use information about you to provide this product and/or service, for example:

4.2.1 To contact you to confirm arrangements.

4.2.2 To notify you about changes to terms and conditions.

4.2.3 To tell you when it is time to renew membership or re-register for activities

4.2.4 To process payments or send you receipts required.

4.2.5 To provide you with the benefits and services to which you have subscribed. We do so because it is necessary for the performance of a contract.

4.2.6 For safeguarding and safety purposes.

4.3 Legal obligations

4.3.1 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 the gymnast 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 act appropriately.

4.3.2 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.

4.3.3 If you are wishing to volunteer or work for us, we may 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.

4.3.4 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.

4.4 Legitimate interests. We rely on legitimate interests for the following purposes:

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

4.4.2 Holding emergency contact information

4.4.3 Maintaining attendance registers, achievement records and waiting lists

4.4.4 Entering you into a competition and providing results

4.4.5 Collecting additional information to support a participant attending a club trip

4.4.6 Monitoring performance and undertaking fitness assessments

4.4.7 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.

4.4.8 Photography and filming at large club events 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 in line with our photography policy. Let us know if you do not wish to be filmed or photographed or do not want your image to be published.

4.4.10 CCTV images for safeguarding children, crime prevention and monitoring of employee, gymnast and parent activities.

5.1 Further information is provided in the section below on individual rights.

5.1.1 We rely on consent in the following circumstances:

5.1.2 To use your email or telephone numbers for internal marketing purposes

5.1.3 To take photographs and video to promote the club on our website, club social media account and in communications.

5.2 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.

5.2.1 If you provided any consent for a specific purpose as part of the information you provided on our behalf through the British Gymnastics membership platform or Love Admin, these consents can be withdrawn at any time by logging into your British Gymnastics account or contacting us for additional support. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

## 6. Special categories of personal data

6.1 Special categories of personal data are a category of information that is more sensitive and requires greater protection. 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:

6.1.1 You have given your explicit consent or have made this information public.

6.1.2 We are required to do so to establish, exercise or defend a legal claim.

6.1.3 We are required to do so to comply with employment or social security or social protection law.

6.1.4 There is a substantial public interest in doing so or it is in your vital interests and you are unable to provide consent.

## 7 Marketing

7.1.1 We will send you our newsletter and other information about our activities, services and products that we think might be of interest to you based on our age, interests and experience. We will send you this information by email.

7.1.2 You can ask us to stop sending you this information at any point by contact [hello@joefrasergymnastics.co.uk](mailto:hello@joefrasergymnastics.co.uk) . It may take up to [21 days] for this to take place.

7.1.3 Although you will be unable to withdraw from marketing emails, you will continue to receive the club newsletter which will contain important information for parents.

## 8. Why we share information about you

8.1 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.

### 8.1.1 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).

8.1.2 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.

#### 8.1.3 Insurance

#### 8.1.4 Obtaining legal or professional advice

8.1.5 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. We only disclose information that is strictly necessary to deliver the service.

### 9. Transfers of data out of the EEA

9.1 We will not transfer or store your personal data outside the UK or the European Economic Area (EEA).

### 10. Individual rights

10.1.1 To be informed about how your information is processed (set out above)

10.1.2 To access any personal data held about you

10.1.3 To have your data rectified if it is inaccurate

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

10.1.5 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.

### 11. Data retention and transferral

11.1 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.

11.2 Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose.

11.3 Photographs and other video footage captured for promotional purposes will be retained for up to 4 years old. After this time, they will be deleted unless we consider them to be of public interest in which case they may remain in active use. Please be aware that social media platforms may process the data in line with their own policies and procedures

11.4 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.

### 12 Additional information

12.1 To exercise any of your rights or if you have any questions about our privacy notice please contact: [hello@joefrasergymnastics.co.uk](mailto:hello@joefrasergymnastics.co.uk)

12.2 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.

12.3 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.

12.4 Whilst every effort will be made to fulfil subject access requests, in relation to the CCTV system, if the identity of others cannot be obscured by a technical consultant (the system installer) then copies of the playback may be unsuitable to be released to the individual requesting the data. Images and videos are regularly, automatically overwritten so a subject access request relating to the CCTV system should be made promptly to [hello@joefrasergymanastics.co.uk](mailto:hello@joefrasergymanastics.co.uk)