

Orwell Panthers Athletics Club – Data Protection Policy

This policy explains how the information that OPAC collects about you is used and kept securely. It also explains your privacy choices when providing OPAC with information, and your rights to access this information under Data Protection Legislation.

1. General

- 1.1. Orwell Panthers Athletics Club (a charitable incorporated organisation with Charity No. 1163145) (**OPAC**) must process personal data from time to time to carry out its charitable objects. OPAC is committed to compliance with the data protection legislation in force and applicable to it from time to time (including its obligations under the General Data Protection Regulation 2016/679 (**GDPR**)(the **Data Protection Legislation**)).
- 1.2. For the purposes of applicable Data Protection Legislation, OPAC is the Data Processor. In this policy, a reference to 'we', 'our' or 'us' is a reference to OPAC.
- 1.3. OPAC will take reasonable care to keep the information provided to it secure and to prevent any unauthorised access to it.

2. Your information

- 2.1. When applying to become a member of OPAC, or to become a volunteer, coach, official or trustee with us, we will collect certain information about you. Depending on your role, this may include your name, date of birth, gender, contact details, qualifications and licences that you hold, as well as contact details of the person(s) that you nominate as your emergency contact.
- 2.2. Where relevant, we may also collect information relating to any disabilities or health conditions of our athletes and members. For example, we may need to obtain health information in order to process an athletes' Para athletics classification, Special Olympics division or equivalent categorisation (as relevant to other competitions and events).
- 2.3. In any application for membership of OPAC or for an associated role within OPAC, we may collect information regarding criminal offence history where relevant (so far as permitted by law).
- 2.4. We acknowledge that information collected under paragraphs 2.2 or 2.3 may be classed as special category data or criminal offence data for the purposes of the Data Protection Legislation and accordingly require additional protection.
- 2.5. While a member of OPAC (or volunteer, coach, official, trustee or other associated person), we may collect and process further information for example results of competitions.

3. Use of your information

We may use this personal information for purposes including (but not limited to):

- 3.1. processing your application to become a member, volunteer, coach, official or trustee;

- 3.2. notifying you of important changes to OPAC relevant to you as a member, volunteer, coach, official or trustee;
- 3.3. dealing with your requests or enquiries;
- 3.4. contacting you in relation to your membership (or other relationship with us);
- 3.5. making applications on your behalf for competitions;
- 3.6. keeping records that are required to be kept further to our objects and our status as an athletics club affiliated with England Athletics and UK Athletics and a charity registered with the Charity Commission; and
- 3.7. where necessary for pursuing our charitable objects.

4. Legal basis for data processing

- 4.1. The basis on which we process your data is usually for legitimate interest of furthering our charitable objects. Under the Data Protection Legislation we can process your data on this basis unless there is a good reason for overriding this legitimate interest.
- 4.2. This means that we can process your data in the ways that you would reasonably expect us to, with minimal impact to your privacy. In addition, we can process your data where there is another compelling justification for doing so (providing such processing is sufficiently necessary for a relevant legitimate interest).
- 4.3. Another legal basis for processing your data is your explicit consent (for example, in your application to become a member of OPAC or to receive email correspondence from us).
- 4.4. We could also process your data pursuant to a contract that we have with you (for example, your membership contract) to carry out our obligations to you in relation to that contract and provide the service that you are paying for.
- 4.5. If such processing was necessary, we can process your data to comply with a legal obligation or for vital interests (for example to protect your life).
- 4.6. For special category data
 - 4.6.1. we will in the first instance try to obtain consent for its use for the particular purpose required;
 - 4.6.2. where such seeking such consent under clause 4.6.1 is not desirable, possible or permitted, we can also process your data for one or more of the following bases:
 - 4.6.2.1. the processing is necessary to protect vital interests where you are physically or legally incapable of providing consent;
 - 4.6.2.2. the processing is carried out in the course of our legitimate activities with appropriate safeguards further to our charitable purposes (save that we will not rely solely on this ground to disclose the data to a third party);

- 4.6.2.3. you have made the data public;
- 4.6.2.4. the processing is necessary for legal claims or judicial proceedings;
- 4.6.2.5. the processing is necessary for reasons of substantial public interest, including (but not limited to):
 - 4.6.2.5.1. providing support for members with a particular disability or medical condition where necessary to raise awareness of the condition or provide support to the member with the condition (or a significant risk of developing the condition) or the member's relatives or carers (or enabling such persons to support one another);
 - 4.6.2.5.2. measuring designed to protect the integrity of athletics or any other sport or sporting event (where consent would prejudice such measures);
 - 4.6.2.5.3. the processing is necessary for the purposes of reviewing or equality of opportunity;
 - 4.6.2.5.4. preventing or detecting unlawful acts;
 - 4.6.2.5.5. safeguarding children and persons over 18 at risk; or
 - 4.6.2.5.6. necessary processing for insurance purposes; or
- 4.6.2.6. such other condition permitted by the Data Protection Legislation from time to time.

5. Sharing data

It will sometimes be necessary to share your data with third parties. Where possible, we will obtain your consent before sharing your information. This may include:

- 5.1. UK Athletics;
- 5.2. England Athletics;
- 5.3. Suffolk County Athletics Association;
- 5.4. Organisations responsible for competitions (e.g. Special Olympics);
- 5.5. Coaches, officials and volunteers managing our events; and
- 5.6. (for coaches, officials and volunteers) the Disclosure and Barring Service.

Please contact us if you would like more information relating to how your information is being processed.

Protecting your information

When you provide us with your personal data, you agree to the transfer, storing or processing of your data within the European Economic Area.

We will take all reasonable steps to ensure that your data is treated securely and in accordance with this policy. Please consider the safety of how you provide us with your information, and be aware that we cannot guarantee the security of information provided via unsecure means of communication (for example, the internet).

Third party links

Where you connect with us over social media or follow any third party links from our website, please note that these sites have their own privacy policies and we do not accept any responsibility or liability for these policies. We recommend that you check these policies before submitting any personal data to these websites.

Your rights

Under the Data Protection Legislation, you can ask to see any personal information that we hold about you (a **Data Subject Access Request**). You also have the right to request that the information that we hold about you is updated and / or deleted. These requests can be made verbally or in writing.

We can ask you to provide reasonable proof of your identity when making a request relating to your personal information (for example, your driving licence or passport), or we can request information about the source or location of the information that you are requesting and / or providing.

Please note:

- If you request the information via electronic means or otherwise provide your permission for us to do so, we can provide the response in electronic form.
- We will try to respond to any request within one calendar month of the request, but we can extend this for up to two calendar months where the request is complex and / or numerous. If we have to extend the time to respond to your request, we will inform you and explain why we have had to do so.
- While in most circumstances we cannot charge a fee for processing such requests, in accordance with the Data Protection Legislation we reserve the right to charge a fee proportionate to the administrative cost if the request is either manifestly unfounded. We can also charge a fee proportionate to the administrative cost if the request is for a further copy of information already provided.

Contact us

If you require further information about this policy, the information that you have provided to us, or how your data is processed, please visit our website at <http://orwellpanthers.co.uk/> or speak to the Welfare Officer:

Name:

Tel:

Email:

Data Protection Policy

If you have concerns about the way that your data is being processed and you are not satisfied with the information provided by us, you have the right to report your concerns to the Information Commissioners Office (www.ico.org.uk).

Adopted:

Orwell Panthers Athletics Club: