

Privacy Notice for Members: Gymnasts & their Parents/Carers



Rotherham School of Gymnastics 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

(We have separate notices which provide privacy information relating to employees and non-members who use or request our services.)

It is important that you read this carefully as it contains key information about how we use your personal data and your associated rights. Throughout this notice, we use the words 'you' and 'your' to refer collectively to both the child taking part as a gymnast and their responsible adult.

About us

Rotherham School of Gymnastics is an independent gymnastics club. We provide the opportunity for children and young people to participate in a range of activities, which include recreational gymnastics classes, gymnastics training, competitions and other related activities or services. Our members are gymnasts who attend classes regularly and they are supported by the adults who register them for classes and are responsible for them.

We register with British Gymnastics which 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. This Privacy Policy is based on a template provided by British Gymnastics to help us meet our legal obligations.

We also affiliate to Yorkshire Gymnastics which runs competitions and events in which we may participate.

Information we collect about you

When you join Rotherham School of Gymnastics, we will collect the following categories of personal information about you when we ask you to complete a membership form.

- Gymnast name*
- Gymnast address
- Gymnast date of birth*
- Gymnast gender
- Contact details of primary adult contact*
- Contact details of alternative adults to contact in an emergency
- Any relevant medical conditions and/or disabilities and additional related information

The information marked with an * above is essential for us to provide your membership. If you do not provide this information we will not be able to offer membership. You can choose whether to provide

other information, but if you do not it may affect our ability to meet your needs and to protect your well-being.

British Gymnastics will also collect personal information when you join or renew your British Gymnastics Membership. They will share some of this information with us so that we can check that you hold current membership at the correct level and that our records match theirs, to help us spot any errors.

During your membership with us, we will collect, store and process the following categories of personal information about you.

- Gymnast attendance, progress and achievement records
- Records of participation in classes, additional programmes and events
- Payment and purchase history
- Any communications from, to or relating to you

In some circumstances, we may also need to collect, store and process the following personal information.

- Any individual risk assessments
- Details of any reasonable adjustments or steps taken to support individual needs
- Any accident or incident reports
- Records of any disciplinary or safeguarding concerns and action taken
- Bank or other payment details
- Dietary requirements if attending events where food will be provided
- Additional relevant information if attending external events, trips or visits, especially if these involve travel away from home.

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

- Training and technical information
- Lifestyle information
- Competition results
- Records of injuries

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, trips or other activities or you buy a product from us we usually need to use information about you to provide this service or product, for example:

- to contact you to confirm arrangements or to discuss any changes to class times.
- 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, services and products which you have requested, purchased or subscribed to.
- to tell you about events or sessions you have been selected for or become eligible for.

In order to provide a comprehensive and structured gymnastics programme, which is the primary service our members subscribe to, we need to process information in the following ways.

- **Maintaining attendance registers**

For health and safety purposes and club records, we need to maintain a register of those in attendance at gymnastics sessions or other club activities.

- **Maintaining records of gymnasts' achievements, abilities and skill performance**

We need to record and monitor this information so that we can ensure you are in the right class, are rewarded for your progress and can be supported to achieve at your own level.

- **Holding waiting lists**

If there are no places in your preferred session, we can place you on a 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.

If you wish to enter a competition organised by another gymnastics body, for example British Gymnastics, Yorkshire Gymnastics or another gymnastics club we will provide your information to the organiser to enable you to take part in the competition or event that they are organising. This will usually include your name, date of birth, gender and category and may sometimes include your British Gymnastics membership details.

Legal obligations

We have a duty of care to ensure it is safe for you to take part in gymnastics activity and to keep you 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 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.

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 needs. We will keep a record of any steps we take to support inclusion.

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 accounting or health & safety 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:

- **Holding emergency contact information**

When you join the club, we collect contact details. We also ask you to provide alternative emergency contacts which we will only use in exceptional circumstances if we are unable to contact the primary responsible adult.

- **Filming for coaching purposes**

We may film gymnasts during gymnastics sessions or competitions for coaching purposes. This may be so that the gymnast can watch their own performance, so that we can monitor their

progress over time or to support the internal training and development of our coaches. These images will not be shared outside the club unless specific prior consent has been given.

If you would prefer not to be included in any filming for coach training and development purposes, please let us know. We will be happy to avoid using any individual images of you. We will not be able to guarantee that you will not feature in the 'background' of videos filmed of other gymnasts.

- **Photography and filming to promote the club**

We may take photographs or videos to promote the club on our website, club social media account, printed materials and in communications. This may take place at large club events or during regular or additional activities. At club events such as competitions, we may invite professional photographers to take photographs for sale at the event and we may use the images they have taken for our own promotion if they give us permission to do so.

Before we publish any individual images for promotional purposes, we will check that we have your consent. You will be asked for your consent on your membership form, but you can change your answer at any time by notifying us at reception or in writing.

Unfortunately at large events, it will not be possible or practical for us to avoid you being included in images collected. If we do not have your consent we will avoid publishing any individual shots of you, but we cannot guarantee that you will not appear in group shots or in the background of images focussed on another gymnast.

If we are taking photographs during regular activities, you may be included in images we take, but we will avoid using any individual shots of you or group shots where you are clearly identifiable. Again, we cannot guarantee that you will not appear in the background of images focussed on another gymnast, but we will do our best to avoid this where possible.

If you find an image on our social media account or website which includes you and that you are uncomfortable with, please do let us know straight away and we will change it for an alternative image if at all possible.

Please be aware that other clubs, individuals or professionals may also take photographs or videos at any public events that your child takes part in. This is outside our control.

- **Collecting additional information to support a participant attending a club trip**

Occasionally we organise external visits, events or trips. If you register for one of these events, we may need to collect additional information, that may vary dependent on the specific activities and whether they involve meals and/or travel.

- **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.

- **Publishing achievements and event results.**

When events (for example competitions) have taken place within the club or when we have attended events elsewhere, we may publish the results from the event on our noticeboards, website or club social media and we may send details to local press. This could include name, age group, scores achieved and any awards or medals received.

We may also publish other achievements of our gymnasts during their regular classes. For example, this may include their name and/or photograph on the 'Gymnast of the Week' wall. If you would prefer us not to publish your achievements in this way, please let us know.

We have carried out a legitimate interest assessment 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 address or telephone numbers for marketing purposes.
- To publish photographs of individuals for promotional or marketing purposes.
- To publish names and ages of gymnasts on club social media or the club website to celebrate an achievement.

We will ask whether you give consent for these purposes when you complete your club membership form. If you give consent you have the right to withdraw this consent at any time, which you may do by contacting us using the contact details below. 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 the law;
- 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

If you give consent, we may send you information about activities, services and products that we think might be of interest to you based on your age and experience. We may provide this information by email, SMS, post or telephone (subject to your communication preferences).

We will ask for your consent when you complete your membership form at the beginning of each year. You can ask us to stop sending you this information at any point by asking at reception for a Duty Manager or by replying to an email or SMS with the word 'STOP'. You can also write to us using the address at the end of this privacy notice.

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. As outlined above, we may also need to share your information with the organisers of external events or activities you choose to participate in.

We may also be required to share your personal information for 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

To operate the business efficiently and to help us to provide effective services to our members, we may use third party service providers to:

- Process documents for internal club use by using third party cloud-based storage services to store our own files securely.
- Obtain business services. At present this includes:
 - 'GoCardless' to process direct debit payments on our behalf.
 - 'iZettle' to process credit and debit card payments on our behalf.
 - 'Facebook' to provide a social media and marketing service, including sharing photographs of club activities and club news.

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.

We may change providers or engage providers of new services if we consider this will benefit the club and its members. If we make changes or add new service providers, we will update this privacy notice and place a notice in reception.

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

Transfers of data out of the EEA

If our use of third party service providers will involve personal data being stored or transferred outside the UK, we will check that their privacy policy and/or our contract with them ensures that there are adequate safeguards to protect your information to meet the requirements of GDPR.

We are happy to provide privacy information from each of our service providers. Please contact us using the details in this notice if you would like to see this information.

Individual rights

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

- **To be informed about how your information is processed**
We do this by making this privacy notice available to all members and publishing updates as described at the end of this notice.
- **To access any personal data held about you**
You have the right to access the personal information we hold about you. You can request a copy of any 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 (unless there is a valid, lawful reason to retain it)**

If you leave the club, we will continue to store the information we hold about you for the remainder of the current membership year and the following two membership years. This is so that if you decide to return we can access your original records to help us to place you in the most suitable class. At the end of each membership year, we will delete the records of gymnasts who have not participated at all during the last two membership years, except for any accounting records which need to be retained for longer to meet legal obligations and any accident reports which need to be kept for insurance purposes.

Photographs and video footage that have been taken for individual coaching purposes will be retained while your child is active in our programme. On a quarterly basis, we will delete any video footage of gymnasts who are no longer in our programme.

Photographs and video footage that has been taken for coach training and development will be reviewed on an annual basis. We would expect to update training materials every two to three years and will endeavour to replace images with current members.

Photographs and video footage captured for promotional purposes will be retained for up to 3 years. After this time, they may be deleted or 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 portability**

If you wish to move to another club, any information you have given to British Gymnastics can be transferred to another club registration by logging into 'My Account' on the British Gymnastics system.

- **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.

- **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 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 exercise any of your rights or if you have any questions about our privacy notice please contact:
Claire Wheeler, Centre Manager, Rotherham School of Gymnastics, Cornish Way, Parkgate, Rotherham, S62 6EG.

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.

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 use 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/or 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 1st September 2018 and last updated on 1st September 2018.

We may change this privacy notice from time to time, when we do we will inform you promptly. For minor changes, we will display a printed notice in our reception area. For major changes, we will inform all members by letter, email or by distributing a printed copy to all members.