# Generation Gymnastics CIC privacy notice – members and volunteers

Generation 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.

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;

We have a separate notice which provides privacy information relating to employees.

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

Generation Gymnastics CIC is a not for profit organisation. We provide the opportunity for our members/people to participate in our activities, which include recreational classes, training, camps, 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 South East Gymnastics who runs competitions and events in which we may participate.

## 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, We also collect essential (i.e. Name, age, medical and emergency contact information) so we have this to hand in the Gym in case of emergence.

- 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
- Bank details (If 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).

*This information 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)

If you attend an event or trip with the club, we will also collect the following information where relevant:

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met; and
- Passport information if the trip is abroad.

## 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 we usually need to use information about you to provide this 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 contact you in case of emergencies or with information you may need to know.
- To keep you up to date with gymnastics classes or changes.

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 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 or your child's needs. We will keep a record of any steps we take to support inclusion.

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. For example, if you are considered by British Gymnastics to be unsuitable to take on the role, we may share relevant and proportionate information about criminal offences where it is deemed that while you are not considered unsuitable to take on the role, if it is considered necessary for safeguarding purposes.

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 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 it 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, 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 facebook page.

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

- **Collecting additional information to support a participant attending a club trip**
  Occasionally we organise residential events or trips. If you or your child registers for one of these events, we will need to collect additional information, that may vary dependent on the specific activities and whether they involve meals and travel. Additional information we require may include passport information and any other relevant information necessary to provide support whilst away from home.

- **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 at large club events (annual club championships/club show, competitions to promote the club**
  At our large club events such as our annual club competitions/show and club display, we take photos to promote club activities and may film the event to create a DVD. We publish images on our website, social media account and in our communications. Any images of children will be published in line with British Gymnastics 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.

  We do not use any tracking or analytics on our website. Your IP address will be logged by our webserver but we would not be able to identify you from this information alone.

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 at a small club event or training for publication.**
  With your consent, we may also take photos during training or at [small] club events to promote the club on our website, club social media account and in communications. All film and photos of children will be published in line with our safeguarding policy.

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 consent for a

specific purpose as part of the information you provided on our behalf through the British Gymnastics membership platform, this consents can be withdrawn at any time by logging into your British Gymnastics account. 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;
- 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 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

You can ask us to stop sending you this information at any point by emailing admin@generationgymnastics.org.uk.

## 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 - i.e Loveadmin.com or other services we may need to use to keep your information up to date and payments secure.

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, will only share your information with any other third parties with your prior agreement.

## Transfers of data out of the EEA

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

## 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' at any time to view/amend/delete the information we hold about you that has been collected by the British Gymnastics system. 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. (accident forms need to be kept for 6 years after the age of 18 years) 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 12 month.

  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 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 us for an objection 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 exercise any of your rights or if you have any questions about our privacy notice please contact:

Kerrie Evans admin@generationsymnastics.org.uk

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 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 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 1st June 2018 and last updated on 12th October 2019.

We may change this privacy notice from time to time, when we do we will inform you via email (this policy along with all our policy and procedures is on our website.