



### **PRIVACY NOTICE FOR OUR MEMBERS**

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 membership 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 player/participant of hockey who has registered his/her interest in participating in the sport with Addiscombe Hockey Club and/or whose details we have collected from you or other third-party referral;
2. a coach, umpire or technical official affiliated to Addiscombe Hockey Club; or
3. a fan, participant or supporter of hockey that has contacted us and/or signed up to receive updates about upcoming events, news items and ways to get involved further in hockey.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws [as we are not required to do so], but the Club Secretary 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**

When you sign up for membership with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, address, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- records of interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- bank and/or other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and

#### **Players/Participants**

If you are a player/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following additional personal information from you:

- details of any school, club and/or county membership;
- details of next of kin, family members, coaches and emergency contacts; records and assessment of any player rankings, gradings, assessments or ratings, competition results, details regarding events/matches/games attended and performance;
- any disciplinary and grievance information;



### Coaches and officials

If you are a coach or official with us, you may also provide us with or we may obtain the following additional personal information from you:

- any coaching code or official number;
- coaching/teaching qualification and/or officiating history and any player rating;
- accreditation/qualification start and end date;
- identification documents such as passport, utility bills, identity cards, etc.

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your health, including any medical condition, health and sickness records, medical records and health professional information;

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that:

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

## **3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you join the Club or when you correspond with us by phone, e-mail or in some other way.

If you are a player/participant of hockey we also may collect personal information about you from any club, school or other organisation you are affiliated with (including where data has been stored on ‘FixturesLive’, ‘Player Pathway System’ and ‘Sportlomo’) or from other referrals such as from coaches or talent scouts.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

## **4. 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	Legal basis
<b>All Members</b>		
To administer any membership you have with us and managing our relationship with you	All contact and membership details, transaction and payment information and records of your interactions with us.	This is necessary to enable us to properly manage and administer your membership with us.
To send you information which is included within your membership, including details about advanced ticket information to events, insurance, competitions and events, partner offers and discounts and any updates on hockey	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about events related to other local Clubs and the Sandilands Sports Trust	All contact and membership details	Where we believe we have a legitimate interest to keep you up to date with events in hockey or where you have given us your explicit consent to do so.
To answer 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 your membership
Retention of records	All the personal information we collect	<p>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 your membership and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of</p>



		<p>the “special category reasons for processing of your personal data” referred to in section 2 above</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
The security of our IT systems	In common with most websites, our Sites log various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.	We have a legitimate interest to ensure that our IT systems are secure, and to protect both you and ourselves from online fraud
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership.	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	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 Addiscombe Hockey Club including AGMs, discipline, safeguarding, Competitions and other activities associated with efficient administration	All the personal information we collect	<p>We have a legitimate interest in doing so to ensure the effective running of Addiscombe Hockey Club for our members. We may have a legal or regulatory obligation to process your data.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal</p>



		obligations or based on your explicit consent.
<b>All members purchasing our products, including event tickets and merchandise</b>		
To administer any membership you have with us and managing our relationship with you, dealing with payments and any support or enquiries made by you	All contact and membership details, transaction and payment information and records of your interactions with us.	This is necessary to enable us to properly manage and administer your customer contract with us.
For the purposes of promoting the Club, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>Players/participants</b>		
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any player pathway programme within the Club	All performance and attendance data and information about your health and medical condition.  Details of any affiliated club and/or county membership.	This is necessary to enable us to properly manage and administer your development through the Club  We have a legitimate interest to ensure that the training and development of players are managed and administered  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
To make decisions about your progression and development through any player pathway programme within the Club	All performance and attendance data and information about your health.  Details of any affiliated club and/or county membership.	This is necessary to enable us to properly manage and administer your development through the Club.  We have a legitimate interest to progress and develop players through the player pathway programme  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.



<p>To arrange for any domestic training day, training camp or tournaments in addition to overseas training camps or tournaments or transportation to and from an event</p>	<p>Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our sports facilities and to monitor and manage sickness absence</p>	<p>Health and medical information</p>	<p>We have a legitimate interest in doing so to provide a safe and accessible environment for you to train and compete.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<p>To gather evidence for possible grievance or disciplinary hearings</p>	<p>All the personal information we collect including any disciplinary and grievance information</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>For the purposes of equal opportunities monitoring</p>	<p>Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and performance data</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of</p>



		the “special category reasons for processing of your personal data” referred to in section 2 above.
Where appropriate to register you for Surrey, South or England Hockey competitions	<p>All medical and non-medical performance and attendance data.</p> <p>Details of any affiliated club and/or county membership.</p>	<p>This is necessary to enable us to register you onto and properly manage and administer your registration and eligibility for competitions and update and retain individual records such as goals, appearances and disciplinary cards.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
<b>Coaches and officials</b>		
To administer your attendance at any courses or programmes you sign up to during your membership of the Club	<p>All contact and membership details, transaction and payment data.</p> <p>Details of your current coaching/teaching qualifications and/or officiating history.</p>	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
To conduct performance reviews, managing performance and determining performance requirements	<p>All performance and attendance data and information about your health.</p> <p>Details of your current coaching/teaching qualifications and/or officiating history.</p> <p>Qualification start &amp; end dates</p>	<p>This is necessary to enable us to properly manage and administer your development through the course and/or programme.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To make decisions about your progression and accreditation status	As above.	As above.



To comply with legal obligations, for example, regarding people working with children or Adults at Risk to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To notify you of any Continuing Professional Development opportunities	Details of your current coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.

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 or we may not be able to properly perform our membership obligations with you or comply with legal obligations and we may have to terminate your position as a member. 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 membership obligations with you. For example, this may include access to team sheets to notify you of your Saturday matches.

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 member benefits to you.

**5. DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- Any party approved by you.
- To any governing bodies or regional / international bodies for the sports covered by our club: to allow them to properly administer the sports on a local, regional and national and international level.
- Other service providers: for example, FixturesLive, SportLomo or Umpire Associations
- 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 security services and other statutory agencies: to assist with the investigation and prevention of crime, the protection of national security and safeguarding.

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

**6. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**





The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

## **7. 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 10 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or 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 you have worked for us.

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.

## **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 [hctic@googlemail.com](mailto:hctic@googlemail.com) or write to us at Club Secretary, Addiscombe Hockey Club, Sandilands Sports Club, Sandilands, Croydon, CR0 5DB.

Version dated 25 May 2018