

# GDPR & Privacy Policy

Reviewed: 31/05/2024

Next Review Scheduled: 31/05/2025

Signed Committee Member: Natasha Craven Date: 31/05/2024



#### **Policy Scope and Statement**

We are committed to respecting your privacy. This notice explains how we may use personal information we collect before, during, and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice outlines how we comply with data protection laws, what your rights are, and confirms that Manchester Hawks Korfball Club is the data controller of your personal information.

Further references to we, our or us in this privacy notice are to the Manchester Hawks Korfball Club.

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 our Data Protection Compliance Manager (Club Chair), 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

Depending on your membership type, we may collect and process the following personal information about you:

- Personal contact details such as name, title, email addresses, and telephone numbers;
- Date of birth;
- Gender:
- Membership start and end date;
- Records of interactions with us (e.g., telephone conversations, emails, other correspondence, and instructions);
- · Records of attendance at events hosted by us;
- Images in video and/or photographic form and voice recordings;
- Marketing preferences to understand how and whether we should contact you;
- Details of next of kin, family members, coaches, and emergency contacts;
- Records and assessments of player rankings, grading or ratings, competition results, and details regarding events/matches/games attended and performance (including data from player pathway programs);
- Disciplinary and grievance information.

#### 2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store, and use the following "special categories" of more sensitive personal information:

• Information about your health, including medical conditions, health and sickness records, medical records, and health professional information

We process this special category personal data based on the following grounds:

- Necessary for reasons of substantial public interest, on a lawful basis
- Necessary for the establishment, exercise, or defence of legal claims
- Based on your explicit consent

We may be required to collect criminal records information about you for DBS approval. This information is processed based on legal obligations or your explicit consent.

#### 3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member or when you correspond with us by phone, email, or other means. If you provide details of emergency contacts, they have a right to know how their personal information is collected, used, and shared. It is your responsibility to share this privacy notice with them.

## 4. USES MADE OF THE INFORMATION



The table below describes the main purposes for which we process your personal information, the categories of information involved, and our lawful basis for processing:

| Purpose  | Personal Information Used   | Lawful Basis   |
|--|---|--|
| To administer your membership and manage our relationship with you, including payments and support/service inquiries         | All contact and membership details, transaction and payment information, records of interactions, and marketing preferences | Necessary for managing and administering your membership contract with us  |
| To send marketing information, including newsletters, event details, products, and information about our commercial partners | Contact details and marketing preferences   | Your explicit consent  |
| To answer queries or complaints  | Contact details and records of interactions   | Legitimate interest in providing complaint handling services   |
| To retain records  | All personal information collected  | Legitimate interest in retaining records for complaints, claims, and managing membership and club administration   |
| To promote the club, our events, and membership packages   | Images in video/photographic form   | Your explicit consent  |
| To administer attendance at courses or programs  | All contact and membership details, transaction and payment data  | Necessary for managing and administering attendance  |
| To ensure health and safety and assess fitness for participation, including providing adjustments for disabilities           | Health and medical information  | Special category reasons for processing personal data  |
| To gather evidence for possible grievance or disciplinary hearings   | All personal information collected  | Legitimate interest in ensuring a safe and fair environment and effective management of disciplinary matters; special category reasons for processing data |
| To monitor equal opportunities   | Name, title, date of birth, gender, and medical information   | Legitimate interest in promoting an inclusive environment; special category reasons for processing data  |
| To comply with safeguarding requirements   | Information about criminal convictions and offenses   | Legal obligations or explicit consent  |



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 contract with you or comply with legal obligations and we may have to terminate your membership. 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 contract with you.

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. DIRECT MARKETING

We may contact you by email, post, or SMS with information about products and services we believe you may be interested in, in accordance with your marketing preferences. You can opt out of marketing messages at any time by replying to correspondence with "Unsubscribe or successfully contacting us as described in the "Contact us" section below.

#### 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- Any party approved by you
- Governing bodies or regional bodies for sports administration on a local, regional, and national level
- Service providers such as Playwaze (league administration)
- Government or regulators for legal compliance or investigations
- Police, law enforcement, and security services for crime prevention and national security

# 7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

We do not transfer or store your personal information outside the UK and the European Union.

## 8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The retention period for your personal information varies based on the type of information and the reason for its collection. Generally, personal information is retained for 6 years after your last contact with us or the end of your membership, with exceptions for:



- Unsuccessful membership applications (retained for 12 months)
- Information relevant to personal injury or discrimination claims (retained until the limitation period expires for these individual types of claims)

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. You may update the personal information we hold about you by using the details set out in the "Contacting us" section below.

#### 9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights regarding your personal information:

- Right to be informed about its use
- Right to access the information we hold about you
- Right to request correction of inaccurate information
- Right to request erasure in certain circumstances
- Right to restrict processing in certain circumstances
- Right to object to information processing
- Right to request data transfer to you or another entity
- Right to object to automated decision-making processes

For more details, visit the Information Commissioner's website at <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>. To exercise your rights, contact us using the details in the "Contacting us" section.

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.

#### **10. CHANGES TO THIS NOTICE**



We may update this privacy notice periodically. 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.

# 11. CONTACTING US

For any queries or complaints about your personal information, please contact us at manchesterhawks@hotmail.co.uk.