



1485 Triathlon Club – Privacy & Data Protection Policy

Policy Statement

The 1485 Triathlon Club is committed to the principles of privacy and data protection in accordance with best practices and relevant legislation, including the Data Protection Act (DPA) and the General Data Protection Regulations (GDPR).

This Policy explains when and why we, the 1485 Triathlon Club, collect personal information about our Members (and other people who may participate in Club events), how we use it, how we keep it secure, and your Rights in relation to it under the DPA and the GDPR.

The Club may collect, use, and store your personal data, as described in this policy and as described when we collect data from you.

The Club reserves the ability to amend this Policy from time-to-time without prior notice. This Policy will be published on the Club's website, with the most recent amendments clearly indicated including additions or removed content.

The Club will always comply with the GDPR when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner's Office. For the purposes of the GDPR, we will be the 'controller' of all personal data we hold about you. The Data you provide to us will never be sold or shared with third parties unless you have provided your consent.

The 1485 Triathlon Club Privacy and Data Protection Policy applies to and is mandatory for everyone involved in the Club. Failure to comply with this policy will be addressed without delay in line with the Club's disciplinary procedures and may ultimately result in dismissal or exclusion from the Club.

Types of Information Held

The Club is run by an elected committee, with officers accountable for the collection and handling of personal data, including:

Type of Information	Purpose	Basis of processing
Member's name, address, telephone number, e-mail address	Managing the Member's membership in the Club, performing administration, and providing information in connection with and related to that membership	In the interest of the Club & Members in managing the Club
Emergency contact details – provided on coached session forms/membership cards	For coaches and/or First Aiders to contact emergency contact in the event of an emergency	Protecting the Member's vital interests and those of their friends, family and/or dependants and for the legitimate interests of Members in operating the Club.
Photos and videos of Members, volunteers, officials, and others who participate in both Club and external events – including coaching sessions or social activities	Putting on the Club's website and in publications – including social media pages and use in press releases	For the legitimate interests of Members in operating the Club.
Member's name, address, telephone number, e-mail, address and date of birth/age-related information, Club affiliations and race times. For events we run any published results will be limited to names, gender, race times, and any Club affiliations.	Managing race entries and race results. Sharing race results with other clubs and the race governing bodies – such as the British Triathlon Federation, England Athletics and providing race results to print and online media	For the legitimate interests of Members in operating the Club.
Member's name, address, telephone number, e-mail Address Managing volunteers for Club events. This may include details such as those who are First Aid trained.	Managing volunteers for Club events. Sharing information between volunteers to enable effective running of those events. E.g., social events and the Club Audax & 5 miler.	For the legitimate interests of Members in operating the Club.

Member's name, gender, age, times for League Tables and Triathlon England/British Triathlon race series	Managing league tables and race results. Sharing race results with race governing bodies – such as the British Triathlon Federation.	For the legitimate interests of Members in operating the Club and to foster sportsmanship.
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Security & Storage of Data

Data is stored securely on the membership database which is hosted by Event Centra and also in password protected documents within club files. This data remains the 'property' of the Club and not the hosting site. The only persons who have direct access to this are Entry Central, Chairperson and Secretary. When renewing membership to the Club, we ask for the same information to make sure our records are accurate. The passwords are updated regularly in accordance with good practice standards.

Unless expressly requested to the contrary by you, your email address and name is also added to the Club email distribution list within online software. This is a secure system where your email contact is never shown to the public and is only used by the Committee and approved volunteers to deliver relevant information and occasional event specific updates. All persons on the mailing list can unsubscribe at any time by requesting this.

Your information is only used for general Club communications and management. It will not be used for any marketing purposes or outside the Club. We also take steps to ensure that when your data is shared with your consent – such as during Club events for chip timings – that any such organisations also comply with the GDPR.

We take all steps within our control to make sure your data is kept safe and against unauthorised and unlawful access or against accidental loss. This includes (but is not limited to) keeping passwords updated, storing the information on secure servers with recognised providers (E.g., Google-drive), ensuring accuracy in sending out emails, for example.

If any data breach(es) occurs, such as sending an email to the wrong contact for example, we will report this to the relevant body. This could include the Information Commissioner's Office (ICO) and/or the British Triathlon Federation or England Athletics. We will also seek to tell you as soon as possible. If you believe your Data has been breached, or any other data held by us, you should inform us as soon as possible.

If necessary, a data breach log will be maintained and reported to the Committee at each meeting. However, this does not and should not prevent any breach from being reported/closed as soon as it is known of.

If any Committee member seeks further training on keeping data secure; whether manually or digitally, the Club will take all steps possible to ensure training is provided.

We will also update our Privacy Statement when signing up to events we run so that it reads on the lines of:

“You agree that we may publish your Personal Information as part of the results of the Event and may pass such information to any governing body or any affiliated organisation for the purpose of insurance, licences or for publishing results either for the event alone or combined with or compared to other events. Results may include (but not be limited to) name, any club/ home country/regional/county affiliation, results, age category, penalties.”

“You also agree that in the event of a disciplinary or welfare incident that you are either involved in or witness, we may pass on your personal information to British Triathlon or any other relevant Authorities for the purposes of supporting any investigatory activity into that incident.”

There may also be some data which is related to the Club, such as social media pages on Facebook, Flickr, or Twitter for example. This data is not held by the Club, but rather on the relevant service provider’s platform. If you have any concerns with data held on those, you should contact the relevant provider as the Club does not host these services. They are used solely to publicise upcoming events and training sessions, for example.

Privacy & Data Protection Guidelines

Recognising the size of the Club, there is not an appointed ‘Data Protection Officer’, however the Club Secretary is designated as the ‘Data Compliance Lead’ for the Club, supported by the Committee.

In the first instance, if any individual associated with the Club has a concern about the operation of this Policy or its implications, they should contact the Secretary or other Committee member.

In line with legislation, where the Club is required to process the data of any individual under 16 years of age, parental consent shall be obtained.

Data shall be held in a controlled environment with access to all or some of the information held restricted to:

- Secretary – In relation to the good administration of the Club and for processing membership requests.
- Entry Central – Secure storing data including birth dates of Members.

- Treasurer – Checking payments. Note: payment details are not retained by the Club.
- Coaches – Emergency contacts and medical information on sign-in sheets.
- Results Manager – processing results, including league tables.
- Kit Manager – Distribution of kit stock.
- Race Event Organisers – Details of Marshals/Technical Officials/First Aiders/Paramedics.
- Committee Members - where directly involved in the Committee elections held at the AGM.
- Selected Members – in the course of other sanctioned Club activities.

Where necessary, other Committee members may need access to personal data to support the delivery of their duties, and which will be handled in line with this Policy.

Data will not be shared without the approval of a member of the Club's Management Committee.

Any Committee member(s) retiring from their position on the Committee, either at this point or any other point during the year, will be asked to hand over any personal data they have relating to their previous role, and passwords will be specifically changed to ensure data is protected in line with this Policy.

Any Member who wishes to see the information stored about them can do so. Any request will be actioned within 30 calendar days. This should be made in writing to the Club Chairperson or Secretary – either by email or letter.

The Club will only keep information for as long as it is needed for the purpose it has been provided for. If you are not a Member for a period exceeding three years, or other period set out in our legal obligations, your information will be deleted.

If you leave the Club and wish your information and data to be deleted and removed from our records earlier, contact the Secretary or Club Chairperson in writing (email or letter) to request this. The information will be deleted from our database. Once removed, any such data will not be retrievable. You may therefore be asked as part of our data protection process to confirm that it is you wishing this data to be deleted.

If you have any concerns at all about the data held by the Club, or how it is securely stored, or any other data protection queries you should, in the first instance contact the Data Compliance Lead (the Secretary) or in their absence a member of the Committee.

Your Rights under the GDPR:

- To access your personal data

- To be provided with information about how your personal data is processed
- To have your personal data corrected
- To have your personal data erased in certain circumstances*
- To object to or restrict how your personal data is processed
- To have your personal data transferred to yourself or to another business in certain circumstances.

*In addition to the rights afforded to you by the GDPR, at the Club’s discretion and where practicable to do so, the Club may agree to remove from its website and social media sites images of Members or others participating in Club events following receipt of a request to do so.

Version Control

The 1485 Triathlon Club Privacy & Data Protection Policy will be kept under periodic review but not less than once every three years or sooner if there are changes to changes to legislation and good practice.

Policy Name:	1485 Triathlon Club Privacy & Data Protection Policy
Version:	1.0
Date Last Reviewed:	12 January 2024
Editor:	Pete Winchester
Approved By:	1485 Triathlon Club Committee
Date approved	12 January 2024