

Independent Schools Gymnastics Association

Privacy Policy

Introduction

This notice sets out your rights as a member or user of the Independent Schools Gymnastics Association (hereafter known as ISGA), or as a visitor to the ISGA website, under Data Protection law in the UK and the EU, as revised on 25th May 2018, from when this notice is effective.

This privacy notice tells you what to expect when ISGA collects, uses, retains and discloses your personal information. In this notice, when we refer to “we”, “us” or “our”, we mean ISGA.

Personal information is information that (on its own or together with other information) identifies you or is about you. This includes what you tell us yourself and what we learn by having you as a member or user of our services.

ISGA recognises the importance of protecting personal and confidential information in all that we do. We take care to meet our legal duties. ISGA puts in place all reasonable technical, security and procedural controls required to protect your personal information that we hold, for as long as we hold it. Any information you provide will only be used in accordance with this privacy notice.

To ensure that we process your personal information fairly and lawfully, this notice informs you why we need your personal information, how it will be used, with whom it will be shared and what rights you have in relation to the personal information we collect.

Within this notice, we explain how ISGA acts as the “Data Controller” (the organisation that determines what personal information is collected and how it is used) and that we may collect and use personal information about you from other organisations to provide or improve our services. If we process data on the instructions of another organisation, we would be acting as a “Data Processor”. In such circumstances our use of data would be governed by that organisation's policy and procedures.

Your privacy is protected by law, which says that we can only use your personal information if we have a proper reason to do so. This includes sharing it outside of ISGA. The reasons why ISGA may process your personal information are, 1) to fulfil a contract we have with you, 2) to maintain your affiliation, 3) when it is our legal duty, 4) when it is in our legitimate interest, or 5) when you consent to it. A legitimate interest is when we have a transactional reason to use your information, but this must not go against your rights or freedoms.

Our website: we provide our website in good faith but we cannot guarantee the accuracy or completeness of any statement on it. We request the users of our website to treat its content with caution and to inform us if they know of any errors.

1) What this Privacy Policy covers

Our Privacy Policy explains what this policy covers and:

- the personal information we collect
- how and why we collect and use your personal information
- why we process your personal information
- our use of children's information
- how we will share your personal information, within our group or to other organisations
- how you can change your permissions and your information rights and responsibilities
- cookies, if any are used
- keeping your personal information secure
- how long we will hold your information
- how to contact us
- changes to this policy

2) Personal information we collect

2.1) We collect information necessary to maintain your affiliation to ISGA, to receive your entries to our competitions, to correspond with you about our events and activities, to publish scores and results of competitions and to compile historical archives of our events.

2.2) This information will include your name, the name and address of the school you represent, other relevant information about your school (eg the name of the head or other school official and of pupil numbers in year groups), the names and ages of pupils in your school teams, and contact information including email addresses and telephone numbers.

2.3) We may also collect (if necessary for an efficient way to contact you) your personal home email/telephone details; and other information such as your position within the school or relationship with it; or information about other colleagues of yours who may be involved with your gymnastics teams; or photographic images.

3) How we collect and use your personal information

3.1) We ask you to complete a form to affiliate your school annually. We will ask for contact details such as your email address(es), telephone number(s), address(es) and names of persons responsible for gymnastics in your school. We will use these details to maintain our records of your affiliation, to contact you about our competitions and events. We may pass these details to other officials, competition organisers, other members of the Association involved in the organisation of events and to our sponsors to enable them to send you details of any of their products they intend to bring to an event.

3.2) We will ask you to complete entry forms for competitions, workshops, or other events/activities of the Association. Personal information requested will be used only for the purposes of enabling these events to run properly.

3.3) We will request information about the children in your teams to be entered for a competition, a short while before the competition is due to take place. See section 5 of this Privacy Policy to see how this information will be used.

3.4) Section 7 below explains what to do if you no longer wish to hear from us about any of our activities.

3.5) We may use your personal information to generate aggregated, anonymised data for the purposes of internal reporting, insight and analysis, enabling us to improve what we offer. Where necessary, this exercise may be carried out on our behalf by a third party - see section 6 below.

3.6) We collect and may use your personal information in response to communications you have sent to us or to invite you to participate in events, surveys, meetings or other activities. You do not have to respond to these communications. If you are an official of the organisation, or an organiser for us, we may wish to publish some of your contact details on our website or in communications to members. We will only do this with your consent.

3.7) If you wish to provide us with another person's personal information you should first ask them to read this Privacy Policy and associated documents (*see list at end of this policy) on our website. By giving us personal information about another person you are confirming that he/she has given you consent to provide it to us and that he/she understands how it will be used.

3.8) We will periodically review your personal information to ensure that we do not keep it for longer than is permitted by law (see section 10 below).

4) Why do we process your personal information?

4.1) We will only collect and use your personal information, as described in sections 2 and 3 above, in accordance with data protection laws.

4.2) The reasons ISGA may process your personal information are a) to fulfil our contract with you, b) when it is our legal duty, c) when it is in our legitimate interest, or d) when you consent to it. Under European privacy laws there is a concept of "legitimate interests" as a justification for processing personal information, which for us will be when we need to use it for the purposes outlined in sections 2 and 3 above. This must not go against your rights or freedoms.

4.3) You have a right to object to our use of your personal information for these legitimate interests (see section 7 below). We will not normally ask you specifically for consent when you complete an affiliation or entry form, or visit our website, but these forms and the website will contain references to this Privacy Policy and advice to read it. You can of course withdraw your consent to us using your personal information even if you have not given it explicitly (see section 7 of this policy).

5) Use of children's personal information

5.1) We request schools to provide information about children who are going to compete, in the period preceding a Competition. We will request competitors' names and dates of birth.

5.2) We will use the information we collect to check eligibility to compete in the age group. For this purpose we must receive each team member's name and date of birth, otherwise the child will not be eligible to compete. Access to information about dates of birth will be restricted to officials who need to know for the purpose of validating eligibility.

5.3) We will use children's names in published event programmes and in scores/ results of competitions which will be posted on to our website, and to announce a child's name when he or she is about to compete or be called forward at a presentation of awards. For these purposes, a school has the right to request anonymity for a competitor. If it does, the child will be known only by a competitor number or as A.N.Other. It is the responsibility of schools to make such a request. ISGA and its officials cannot be held liable for a failure by a school to request anonymity. The onus is on a school's teachers or coaches to find out about and implement parents' wishes in this regard.

5.4) It is likely that children will be photographed at competitions. This could be by professional companies who offer their pictures for sale, by representatives of ISGA (eg at medal presentations), by a school's own staff and parents, and by members of the audience. Persons wishing to take photographs will be required to sign a camera register at each event.

5.5) Some pictures of gymnasts may be displayed on our website or in future event programmes. Some may be retained in our archives. We will not publish children's names alongside their photographs, unless we have explicit consent in writing either from the child's parents if the child is under age 16 or from the child if he/she is over 16. This consent is likely to be requested rarely, normally only if there is a sufficiently newsworthy story about a child's achievements that we want to publish.

5.6) Schools may request that a particular child is not to be photographed. The onus will be on the school's teacher/coach to request this in writing beforehand and to ensure that this is adhered to throughout the event. It will for example be necessary for the teacher or coach to withdraw the child concerned from any situation where a team picture is being taken, eg during a presentation or by a commercial photography firm, and for the teacher/coach to inform a commercial firm not to take individual pictures of the child concerned and to prevent any other person taking a picture of the child. ISGA and its officials cannot be liable for any failure by a teacher/coach to ensure this happens.

5.7) Unless a longer retention period is required or permitted by law, we will only hold children's personal information on our systems for the period necessary to fulfil the purposes outlined in this

Privacy Policy or until we are requested to delete it by the school or a child over 16 or parents of a child under 16. Even if we delete personal information it may persist on back-up or archival media for legal, tax or regulatory reasons.

6) Sharing your personal information

6.1) We may share your information with individuals within our group as explained in sections 2 & 3 above.

6.2) Your personal information may be shared with third party organisations, but only when required (for example for legal obligations or regulatory requirements) or if we are using other third party organisations known as “data” processors” under data protection law to support the delivery of our services. These organisations will only process your personal information on our behalf. These organisations may include our sponsors, our website managers or providers of business services such as auditors, consultants, solicitors and insurers to enable ISGA to run smoothly. When we share your information with our approved third party providers, our contractual relationship with them prevents them from using your information for any other purpose outside our instructions to them.

6.3) ISGA will not share or sell your personal information to external companies or organisations for their own marketing purposes.

6.4) Data protection law holds all countries in the European Economic Area (EEA) to the same high standards. We will only send information to countries outside of the EEA if we are following your instructions, complying with a legal duty or working with a third party organisation (as detailed above) whom we are using to help provide our services to you; and if so we will ensure that it is protected to EEA standards or use one or more of the following safeguards: transfer it to a non-EEA country with privacy laws that give the same protection as the EEA; or put in place a contract with recipients that means they must protect it to the same standards as the EEA; or transfer it to organisations that subscribe to Privacy Shield, which is a framework that sets privacy standards for personal information sent between the US and EU countries, including the UK.

7) How to change your permissions. Your rights and responsibilities

7.1) If you do not wish to be contacted by us any more, you can contact our Administrator by emailing administrator@isgagymnastics.org

7.2) You can request a copy of your personal information, as well as why we have that information, who has access to it and where we got it from, at any time, by completing our Data Subject Access form, to be found on our website. Once we have received your request we will normally respond to it within thirty days.

7.3) You have the right to have your personal information rectified if it is inaccurate or incomplete.

7.4) You have the right to request that we delete or remove your personal information from our systems.

7.5) You have the right to “block” us from using your personal information or limit the way in which we can use it.

7.6) You have the right to data portability, which means you can request that we move, copy or transfer your personal information.

7.7) You have the right to object to our use of your personal information including where we use it for our legitimate interests, or where we use it to inform our market research if any and/or user demographics.

7.8) We will use reasonable efforts consistent with our legal duty to provide you with your rights in accordance with data protection legislation. There may be legal reasons why we need to retain your personal information. When we receive your request, we will confirm whether the personal information has been deleted or tell you the reason why it cannot be deleted.

7.9) To make enquiries, exercise any of your rights set out in this Privacy Policy and/or make a complaint please contact administrator@isgagymnastics.org

7.10) If you are not satisfied with the way we handle any complaint you make in relation to your personal information you may be able to refer your complaint to the relevant data protection regulator. In the UK this is the Information Commissioner’s Office who can be contacted by emailing casework@ico.org.uk or telephoning 0303 123 1113.

8) Cookies and Links to other websites

8.1) A cookie is a file sent by a website to your computer or other access device which asks permission to be placed on your computer’s hard drive. If you agree, the file is added and the cookie helps analyse web traffic. We will tell you if cookies are in use on our site.

8.2) ISGA may use cookies to track your usage of our website. If we make use of such a facility, you will be informed on our website that cookies are in use.

8.3) Information derived from cookies is aggregated to provide statistical information about the usage of a website. It will not give us any information which will identify any individual user of the site.

8.4) You can choose to accept or decline cookies. You can modify your browser to decline cookies if you prefer, but this may prevent you taking full advantage of a website.

8.5) Our website may contain links to other websites. If you use a link to leave our website, you should be aware that we do not have control over that other website. Such a site is not governed by our privacy policy. You should be cautious and look at the privacy statement applicable to the website to which you are moving.

9) Keeping your personal information secure

9.1) Keeping information about you secure is very important to us so we store and process your personal information in accordance with the high standards required under data protection legislation. We have put in place reasonable managerial and electronic procedures to secure the information you give us. It is important that you protect your passwords and refrain from using the same password on multiple sites.

9.2) We do our best to keep information you disclose to us secure. However we cannot guarantee its security. By using our website or sending information to us in electronic or paper correspondence you accept the inherent risks of online activity or storage of physical property and will not hold us responsible for any breach of security.

10 How long do we keep your personal information?

10.1) Schools are invited to affiliate to ISGA annually, during which process updated information about the school and relevant individuals will be submitted.

10.2) Personal information about individuals associated with a school may be deleted during a school year if we are informed that an individual is no longer with the school or has moved to other responsibilities within the school, but the responsibility for informing us of such changes lies with the data subject or the school whose affiliation had been submitted by that individual or another person.

10.3) Unless you instruct us otherwise, we will retain your information for up to 12 months beyond the expiry of any affiliation made by the school or a data subject.

10.4) We will retain data about ISGA officials or volunteers until instructed otherwise or until 12 months after they cease to be associated with ISGA.

10.5) Scores and results of gymnastics competitions will be retained as archive material and may continue to be published on our website as part of the history of the organisation. Subjects of that data may request the removal of their names in accordance with the procedures in sections 7.3, 7.4, and 7.5 of this policy.

10.6) We may keep your personal information for longer if we cannot delete it for legal, regulatory or technical reasons.

11) How to contact us

If you have any questions about this privacy policy or our processing of information, if you wish to exercise any of the rights set out in this privacy notice or if you wish to make a complaint about our handling of your personal information, please contact our General Secretary by emailing administrator@isgagymnastics.org or the Vice Chairman judges@isgagymnastics.org or the Chairman chairman@isgagymnastics.org

12) Changes to this Policy

12.1) We may from time to time make changes to this policy. We will publish the revised policy on this page on our website. It is your responsibility as a user to make sure that you are aware of any changes posted there by checking on a regular basis. If you are not happy with the changes you should let us know. Where the changes are significant, we may choose to email you with the details.

12.2) Changes posted on this page will become effective as soon as they are posted.

12.3) This policy is effective as of 25th May 2018.

END OF PRIVACY POLICY

Notes

*Other documents associated with this privacy policy:

Data subject access request form (DSAR), brief statements on our affiliation forms, entry forms, disclaimer statements, and a short statement on our emails requesting team names from coaches. All these contain reminders to refer to our Privacy Policy.