

DATA PRIVACY POLICY

1. About this Policy 1.1

This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website www.activities4u.org.uk regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

2. Who are we?

2.1 We are, Activities 4 U. We can be contacted at Activities 4 U Ltd, PO BOX 74243, London, England SW9 1DU, admin@activities4u.org.uk,
0203 605 1682

What information we collect and why.

| Type of information | Purposes | Legal basis of processing: |
|--|--|--|
| Participant’s name, address, telephone numbers, e-mail, address(es). Parent/ | Managing the Member’s membership of the Club. Keeping in touch with the Member | Performing the programme's contract with the member. |

| | | |
|--|---|--|
| Guardian contact details if under 18 years of age. | (including by newsletter). Managing the duty roster. Performing | For the purposes of our legitimate interests in operating the Club. |
| The names and ages of participants. | Managing the Member's and their dependents' membership of the Club | For the purposes of our legitimate interests in operating the Club |
| Emergency contact details | Contacting next of kin in the event of an emergency | Protecting the member's vital interests and those of their dependants |
| Date of birth/age-related information | Managing membership categories which are age-related | Performing the Club's contract with the Member. |
| Gender Provision of adequate facilities for members. | Reporting information to A4U | For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender. For the purposes of the legitimate interests of A4U to maintain diversity data required by Sports Councils |
| Photos and videos of participants | Putting on the Club's website, social media pages, newsletter and using in press releases | Consent, we will seek Member's consent on their membership application form and each membership renewal form and the Member may withdraw their consent at any time by contacting us by e-mail or letter |
| The Member's name and e-mail address | Creating and managing the Club's online Membership Directory. | Consent, We will seek the Member's consent on their membership application form and each membership renewal form. The Member may |

| | | |
|---|--|--|
| | | withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory. |
| Bank account details of the member or other person making payment to A4U. | Managing the members and participants membership of the Club, the provision of services and events. | Performing the Club's contract with the Member. |
| The Member's name and e-mail address, whilst a current member of the Club | Passing to A4U for A4U to conduct surveys of Members of the Club. See paragraph 5.3 below. | For the purpose and legitimate interests in operating the Club and/or the legitimate interests of A4U and data capture for all forms of funding. |
| Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience. | Information published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the A4U, in each case as a point of contact at the Club. | For the purpose and legitimate interests in promoting the club. |
| Name, e-mail address and telephone number of each Club member. | Information published on A4U's website | For the purposes of our legitimate interests in operating and promoting the Club. |

| | | |
|--|--|---|
| Employees and representatives of suppliers to the Club | Entering into and managing arrangements with suppliers | Entering into and performing contracts with suppliers |
|--|--|---|

4. How we protect your personal data

4.1.1 We will not transfer your personal data outside the EU without your consent.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes. It is possible that third parties may themselves engage others (subprocessors) to process your data. Where this is the case third parties will be required to have contractual arrangements

with their sub-processor(s) that ensure your information is kept secure and not used for their own purposes.

5.3 A4U may use third parties to carry out the surveys but disclose only the personal data that is necessary for the third party to do so and will have a contract in place that requires the third party to keep your information secure and not to use it for their own purposes.

6. How long do we keep your information?

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

7. Your rights explained

7.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our [Data Protection Manager] [insert address or email address].

(a) The right to be informed (knowing how we will use your data).

You have the right to be told how we will use your Personal Data – which is set out in This Notice.

(b) The right of access (being provided with copies of your data).

You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up

to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.

(c) The right to rectification (changing incorrect information we hold).

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.

(d) The right to be forgotten (erasure) (requesting deletion of your Personal Data).

In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).

(e) The right to restrict processing (limiting how we use your data).

In certain situations, you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.

(f) The right to data portability (moving your data in a useable format).

Activities 4 U regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

In addition, *Activities 4 U* will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so
- Everyone processing personal information is appropriately supervised



- It deals promptly and courteously with any enquiries about handling personal information.

In case of any queries or questions in relation to this policy please contact the **Activities 4 U** Data Protection Officer:

Joy Brown

admin@activities4U.org.uk

Date of next review: 12th May 2020