

WILTSHIRE AND SWINDON SPORT (WASP)
PRIVACY NOTICE
20 APRIL 2018

References to **we, our** or **us** in this privacy notice are to **Wiltshire and Swindon Sport (WASP)**

We are committed to respecting your privacy. This notice explains:

- How we may use personal information we collect before, during and after your involvement with us
- How we comply with the law on data protection
- What your rights are

This notice applies to you if you are (or would like to be):

- Registered with WASP and/or RightCoach
- Interested in receiving updates about any of our services
- Taking part in a project, event or workshop organised by us or one of our partners
- Applying for funding
- A sole trader, employee or individual interested in purchasing any of our products or services

Our Senior Management Team has overall responsibility for data protection compliance within 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 OR ABOUT YOU

You may provide us with (or we may collect) **personal information** about you, such as:

- Personal contact details e.g. name, email address, postal address and telephone number
- Date of birth or age
- Gender
- Your school, college or place of work
- Records of your interactions with us such as telephone conversations, emails and other correspondence
- Details you provide about your experiences and interests in sport and physical activity
- Membership of any sport club, governing body or accreditation scheme
- Any feedback you provide in surveys/questionnaires
- Records of your attendance at any events, competitions or workshops delivered by us or our partners
- Images in video and/or photographic form
- Any payment or bank details you provide so that we can receive payments from you or you can receive funding from us and details of those financial transactions
- Use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information
- Any funding application details
- Your marketing preferences so that we know whether and how we should contact you

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

At times, we may need to know more sensitive personal information about you. If this is needed, we will explain why we need it, how it will be used and ask for your explicit consent. This includes:

- Information about your race or ethnicity, religious beliefs, sexual orientation or political opinions
- information about your health, including any medical condition, health and sickness records, or health professional information
- Previous criminal record via DBS checks

3. HOW WE COLLECT YOUR INFORMATION

There are a number of ways we may obtain information about you (see table below). Information from these sources may be combined together, but this is not always the case.

Information provided directly by you:	Information from other sources:
<ul style="list-style-type: none"> ○ Registering with any of our online services ○ Signing-up for our newsletter(s) ○ Making an application for funding ○ Making a booking for an event or workshop ○ Filling in a survey or questionnaire 	<ul style="list-style-type: none"> ○ Visiting our online services or website ○ Participating in a project, event or workshop ○ Making a query or complaint ○ Corresponding by phone, e-mail or letter ○ Interacting via social media ○ From publicly available sources e.g. your organisation's website ○ Via a third party which you have permitted to share your information with us

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:	Lawful basis:
To administer any membership account(s) you have with us and to manage our relationship with you, (including enquiries made by you)	Contact details, records of your interactions with us, and marketing preferences. Use of and movements through our online portal.	This is necessary to enable us to properly manage and administer your account with us.
To send you marketing information we think you might find useful or which you have requested from us (including newsletters, upcoming events, new projects or funding, etc)	Contact details and marketing preferences. Details you provide about your experience in sport and physical activity and any interests you express in getting involved.	Where you have given us your explicit consent to do so. Where you have used a similar service or participated in a similar project, event or workshop with us in the past.
To deal with your complaints	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you.
Retention of records	All the personal information we collect.	In addition to the above, we may have legal or regulatory obligations to retain records. For criminal records history we process it on the basis of legal obligations or based on your explicit consent. See section 2 above.

To conduct data analytics studies to better understand event attendance and trends within sport in the region	Records of your attendance at any events or competitions hosted by us and/or our delivery partners.	We have a legitimate interest in doing so to ensure that our events continue to improve and are targeted and relevant.
For the purposes of promoting sport in the region, our campaigns and events and the work we do as a County Sports Partnership	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 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 in any of the activities or events we host	Records of attendance and health and medical information	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. See section 2 above.
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity, and health information.	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. See section 2 above.
To administer your attendance at any courses, events or programmes you sign up to	All contact details, date of birth, gender, health and medical information	This is necessary to enable us to register you on to and arrange for the effective delivery of our development programmes and events. See section 2 above.
To manage the process of applying to us for funding	All details provided in your funding application.	This is necessary to enable us to properly manage and assess your application.
To make payments to you where we have agreed to fund a project	Transaction and payment data	This is necessary to make payments to you.
To arrange and manage contracts for the provision of services/products	Transaction and payment data, contact details	This is necessary to enable us to properly manage and perform any contract for services and products.
To comply with legal obligations, e.g. when working with children or vulnerable adults	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.

5. CONSENT

At times, you may have a legal or contractual requirement or obligation 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 of our body
- Properly perform our contract with you
- Comply with legal obligations

We may also ask for your consent to hold or use your data for other reasons such as marketing and promotions. These will always be on an 'opt-in' basis, rather than an 'opt-out' basis.

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 previous use of your data and we may still be entitled to hold and process relevant personal information if we have a legal obligation to do so. 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 benefits to you.

6. DIRECT MARKETING

From time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you have set. You can then let us know at any time that you do not wish to receive marketing messages by contacting us (please see the "Contacting us" section at the end of this privacy notice). If you are a WASP or RightCoach member, you can also change your marketing preferences on your profile under the 'account' tab.

7. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you**
- **Any governing bodies or regional bodies for relevant sports** to allow them to properly administer the sports on a local, regional and national level
- **Other service providers and advisors** such as email marketing specialists, payment processors, professional advisors, data analysis and IT services (including CRM, website and video services)
- **External funding providers** for the purposes of making an application for funding
- **Our supply chain partners and sub-contractors** such as course tutors
- **Our partners and activity providers** for the purposes of arranging any events or workshops you have registered your interest in, including (but not limited to) Sport England, Wiltshire Council, Swindon Borough Council, Create Development, Dame Kelly Holmes Trust, Age UK, Community First
- **The Government or our regulators** where we are required to do so by law or to assist with their investigations or initiatives, including (but not limited to) Sport England
- **Police, law enforcement and security services** to assist with the investigation and prevention of crime and the protection of national security

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

8. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

9. 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 5 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to personal injury claims, 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 the event.
- Information that may be relevant to any of our projects may be retained for longer periods in order to allow us to assess the longer-term impact of our support for sports projects.
- Information relating to funding or financial transactions will be held for 7 years for auditing purposes.

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. You may be able to update some of the personal information we hold about you through your online account. Alternatively, you can contact us by using the details set out in the "Contacting us" section below.

10. **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
- 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.

11. **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.

12. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email joy@wiltssport.org or write to us at WASP, Richmond House, 1 Goodwood Close, Epson Road, Trowbridge, BA14 0XE.