



# Netball South West Privacy Policy

Netball South West is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with data protection laws.

This policy covers the different elements of personal information we collect from you, what we do with the information, how long we will hold it, what we won't do with the information, as well as what rights you have.

## Introduction to Data Protection

We have an obligation under Regulation (EU) 2016/679 of the European Parliament – the General Data Protection Regulation ('GDPR') to provide you with information about how and why we use your data. We recognise our obligations and your legal rights set out in the GDPR. We are committed to protecting and respecting your privacy by complying with the principles of the GDPR.

## Who are 'we'?

In this policy, whenever you see the words 'we', 'us' or 'our', it refers to Netball South West. We are the Regional Management Board responsible for supporting netball delivery in the South West region. Netball South West is the controller of all personal data processed by Netball South West.

## Data Protection Officer

Netball South West does not have a Data Protection Officer. However, for information and queries about data protection compliance, email: [southwest@englandnetball.co.uk](mailto:southwest@englandnetball.co.uk), telephone 01823 664825 or write to Netball South West, Somerset Activity and Sports Partnership, Castle Road, Chelston Business Park, Wellington, TA21 9JQ.

## Amendments to our Privacy Policy

If we amend our privacy policy, any changes will be published on our website. If necessary, this will be brought to your attention.

This policy was last updated on: 20<sup>th</sup> October 2018

## What is personal data?

'Personal data' means any information relating to a living individual ('data subject') who can be identified, directly or indirectly by the information.

## The types of personal data we may collect

The data we collect about you will vary, depending on our relationship with you. Below are examples of the sorts of data that we may collect:

- Full name and personal details (e.g. photograph, driving licence);
- Contact information (e.g. home address, email address, telephone numbers);
- Date of birth and/or age;
- Special categories of data such as medical history or race or ethnicity, disability or sexual orientation;
- Next of kin and emergency contact information;
- Imagery in video and/or photographic form and voice recordings;
- Criminal convictions and offences;
- Records of participation at events/sessions/competition;
- Records of enquiries and other correspondence with you;
- Records of netball qualifications held or obtained
- Marketing email lists; and
- Suppliers, sponsors and client lists.



## How we use your personal information

We collect, store and process personal data for several purposes, mainly to inform members and other interested parties about netball activity within the region such as events, competitions, league, courses and promoting further opportunities. We will not use any of the information that we collect from you, or about you, for any purpose other than those listed in this document or for purposes that are similar. If we would like to use your personal data in any other way, we will present you with relevant information at the point at which one of these additional purposes arises.

The GDPR provides that legally we might hold and process your information for any of the following four reasons and we have included below a summary of what that means for Netball South West and how we might use information you provide to us:

Where required to perform a **CONTRACT**. For example:

- To administer and manage our relationship with members.
- To send members information which is included within their regional membership benefits package.
- To administer attendance at competitions, events or training.
- To fulfil your contractual relationship with clients, sponsors and suppliers.

Where required to comply with our **LEGAL OBLIGATIONS**. For example:

- To comply with health and safety requirements. For example, to ensure the safe running of netball sessions and to enable adaptations as required
- To comply with safeguarding requirements. For example, working with children or vulnerable adults
- To ensure you are offering equitable access to your services to avoid discrimination
- For the prevention of fraud and other criminal activities.

Where there is a **LEGITIMATE INTEREST**. For example:"]

- To correspond and to answer queries and complaints.
- To create a better understanding of players and supporters you may process the personal data for the purposes of research
- To arrange for any trips or transportation of officials, athletes or volunteers to events.
- To ensure understanding of the coaching, officiating and volunteering workforce available.
- To comply with awarding bodies' accreditation obligations.
- To administer and monitor attendance at events and competitions.

Where you have provided **CONSENT**. For example:

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- Promoting our sponsors' or partners' services
- Marketing

## Retaining your information

If we collect your personal information, the length of time that we retain it is determined by a number of factors, including the purpose for which we use that information and to comply with our other legal obligations (apart from GDPR). We maintain a Retention Schedule, which records approved retention periods, the reasoning for the retention period and end of life treatment. Some of these retention periods are currently being defined by us and an update of this privacy policy will be added to our website once they have been formally approved.



We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is determined on a case by case basis dependent on what the information is. Data held is reviewed once per season as a minimum and any data no longer required is deleted.

We do not retain personal information in an identifiable format for longer than is necessary. Where you have consented for us to retain your data, we will only hold the data for the duration of your consent.

## **Children**

Children's data are collected and processed in accordance with the information below. Parents and guardians are expected to ensure that the children they are responsible for are aware of how their personal data will be processed by us.

We require parental or guardian consent to process personal data of any child under the age of 14.

## **Using your information for marketing**

We only send marketing information to you if you have explicitly agreed to our doing so or have requested it and we will only do so in the way(s) you have agreed to. You can withdraw consent at any time. See below for more information.

Marketing information covers information about tickets to events, special offers, opportunities, products and services and other commercial information.

In connection with information about tickets, special offers, opportunities, products and services and other commercial information, the categories have been divided into two groups:

- from Netball South West
- from Netball South West about its sponsors and partners

If you want to receive information from either of these two groups but haven't yet requested it, you can do so by visiting [www.netballsouthwest.co.uk](http://www.netballsouthwest.co.uk) and following the GDPR links.

## **Withdrawing consent**

If we contact you and you want to change how – or if – you receive our communications, please visit [www.netballsouthwest.co.uk](http://www.netballsouthwest.co.uk) and follow the GDPR links

## **Sharing your personal data and data processing**

We only share personal data where we are required by law or with our suppliers or sub-contractors who carry out work for us and who you have given us permission to share it with. Other than the circumstances set out above, information about you will not be passed to a third party for any other purposes. All our suppliers and sub-contractors are required by their own data sharing agreements or contracts to treat your data as carefully as we would, to use it only as instructed, and to allow us to check that they do this.

Organisations we may share your personal data with

- All England Netball Association
- County Netball Associations
- Leagues
- Affiliated netball clubs
- Companies, sub-contractors and other persons who help you to provide your courses, programmes, products and services (e.g. Leisure centres where programme are run);
- Data processors: for example, education and training providers, professional services, legal, financial and information technologies that help to improve your products or services.



- Where the law requires it. We may disclose your personal information to third parties if we are under a duty to comply with any legal obligation; to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of your customers, or others, including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction
- Anyone else where we have the data subject's consent.

## Profiling

Netball South West does not perform any profiling that has legal or significant effect nor any automated decision making.

## International transfer

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are resident. We will take all reasonable steps to ensure that your personal information is used only in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws.

International organisations we work with:

- Mailchimp
- Google

These organisations are based in the U.S.A. which is not recognised by the European Commission as a country having data protection, and privacy laws equivalent to those we enjoy as European citizens. MailChimp and Google subscribes to the EU-US Privacy Shield, which is approved by the EU in relation to data protection practices. registration on the Privacy Shield is available to review on the Privacy Shield website [www.privacyshield.gov/list](http://www.privacyshield.gov/list).

## Information Security

Where we have given you (or where you have chosen) a password, which enables you to access certain parts of our website, or membership portal, it is your responsibility to safeguard your password against the possibility that others may use it to gain unauthorised access. Do not store your password anywhere, in written or electronic form, or give it to someone else. Please let [southwest@englandnetball.co.uk](mailto:southwest@englandnetball.co.uk) know if any record containing your password is lost or stolen or if you think there has been a possibility that your security has been breached.

## More on Information Security

We do our very best to keep personal information secure wherever we collect personal data online. We place a great importance on the security of all personally identifiable information associated with our members, supporters, customers and users. We will take all steps reasonably necessary including policies, procedures and security features to ensure that information about you is treated securely and protected from unauthorised and unlawful access and used in accordance with this privacy policy. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control or being transferred, we use our best efforts to try to prevent this.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



## What we don't do with your information

We never sell or share your information with other organisations to use for their own purposes.

## Your rights

The GDPR grants you certain rights ('information rights') which we summarise below.

Right of access	You have the right to obtain confirmation from Netball South West as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right to access that personal data.
Right to rectification	You have the right to oblige Netball South West to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige Netball South West to erase personal data concerning you.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige Netball South West to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.
Right to data portability	You have the right (under certain circumstances, but not all) to oblige Netball South West to provide you with the personal data about you which you have provided to Netball South West in a structured, commonly used and machine-readable format. You also have the right to oblige Netball South West to transmit the data to another controller.
Right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent.
Right to object to direct marketing	Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
Rights in relation to automated decision making and profiling	Netball South West does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

## Your right to lodge a complaint with a supervisory authority

If you wish to exercise any of your rights concerning your personal data, you should contact us at [southwest@englandnetball.co.uk](mailto:southwest@englandnetball.co.uk) or write to us at: Netball South West, Somerset Activity and Sports Partnership, Castle Road, Chelston Business Park, Wellington, TA21 9JQ

Netball South West is not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act.

If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 0303 123 1113, email: [casework@ico.org.uk](mailto:casework@ico.org.uk).

### Revision History

Policy/Version Date	Summary of Change	Contact	Implementation Date	Review Date
7 <sup>th</sup> Dec 2018	Policy First Draft	Jenny Hannis	7 <sup>th</sup> Dec 2018	December 2019



6 <sup>th</sup> Dec 2019	Policy Review	Jenny Hannis	6 <sup>th</sup> Dec 2019	December 2020
11 <sup>th</sup> Dec 2020	Policy Review	Jenny Hannis	11 <sup>th</sup> Dec 2020	December 2021