

# CLARO ORIENTEERING CLUB

## PRIVACY NOTICE

We are committed to respecting your privacy. This notice explains how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club or have entered an orienteering event organised by or on behalf of CLARO Orienteering Club. This notice explains how we comply with the law on data protection, what your rights are and that for the purposes of data protection we will be the controller of any of your personal information.

References to **we**, **our** or **us** in this notice are to the **CLARO Orienteering Club**

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our **Data Protection Compliance Manager** has overall responsibility for data protection compliance in 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 YOU**

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- references and other information included as part of the application process for membership;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- identification documents such as passport and identity cards;
- identification through your Si and or EMIT card
- details of any British Orienteering regional membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any competitor rankings, competition results, details regarding competitions/events attended and performance (including that generated through performance pathway programme);
- any disciplinary and grievance information;

### 2. **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you, ie: information about your health, including any medical condition, health and sickness records, medical records and health professional information.

We may decide not to collect special category personal information about you. In relation to the special category personal data that we do process we do so subject to your explicit consent **OR** on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

### 3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the club, you register an account with us (should that be applicable), when you enter a competition, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of next of kin, family members and/or emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information.

Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the "**Your rights in relation to personal information**" section 9 below.

### 4. **USES MADE OF THE INFORMATION**

The list below describes the main purposes for which we process your personal information which we will use lawfully:

- To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or other enquiries made by you
- To arrange and manage any contracts for the provision of any services or other items
- To send you information which is included within your membership benefits package
- To publish competition results
- To send you other marketing information we think you might find useful or which you have requested from us
- To answer your queries or complaints
- The retention of records
- The security of our IT systems these being hardware or software held or used on our behalf
- To conduct data analytics studies to better understand event attendance and trends within the sport
- For the purposes of promoting the club, our events and membership packages
- To administer your attendance at any courses or programmes you sign up to
- To arrange for any trip or transportation to and from an event
- 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 events or activities we host and to provide appropriate arrangements to address any issues arising
- For the purpose of equal opportunities monitoring
- To comply with legal obligations

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract or other arrangement with you.

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 use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. 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 member benefits to you.

## 5. DIRECT MARKETING

**Email, post and SMS 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 set. You can then let us know at any time that you do not wish to receive marketing messages by email notice to our Data Protection Compliance Officer. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level.
- **Other service providers:** for example, email marketing specialists, payment processors, entry process systems such as SPORTident and Fabian4, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security
- **Our Commercial Partners:** for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners **but only where you have given your express consent for us to do so.**

## 7. 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.

## 8. 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 4 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Your name, year of birth and your results
- Information that may be relevant to personal injury or 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.

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. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

## 9. 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; and
- 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 UK 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. However, we are here to help and encourage you to contact us to resolve your complaint first.

#### 10. **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.

#### 11. **CONTACTING US**

In the event of any request, query or complaint in connection with the information we hold about you, please contact the Data Protection Compliance Officer by email at [information@claro-orienteeing.org.uk](mailto:information@claro-orienteeing.org.uk).

**CLARO Orienteering Club**

**April 2020**