**Members Privacy Policy**

**British Gymnastics Privacy Notice – Membership**

This Privacy Notice takes effect on 25 May 2018.

Your privacy is extremely important to British Gymnastics and we are fully committed to providing you with clear and transparent information about how we use your personal information. We value the trust you give us when sharing your personal information. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this notice.

You can contact our Data Protection Officer (DPO) at data.protection@british-gymnastics.org or at British Gymnastics, Lilleshall NSC, Newport, Shropshire, TF10 9NB if you have any questions.

This notice applies to our members, which includes gymnasts, coaches, judges, welfare officers and other club officials. It also applies to any other individual who provide their information when registering a member e.g. someone with parental responsibility for the member.

**About us**

British Gymnastics is a not-for-profit membership organisation and the central body that governs the sport of gymnastics across the UK.

We have a wholly British Gymnastics-owned subsidiary company Gymnastics Enterprises Limited (GEL) that provides British Gymnastics merchandise, awards and resources and ticketing for some British Gymnastics events. We also support The British Gymnastics Foundation (BGF), a registered charity that provides grants and supports community gymnastics and activity.

Each Home Country has a gymnastics association that affiliates to British Gymnastics. If you are registered with a club based in Northern Ireland, British Gymnastics is solely responsible for the purposes for which your personal data is used in line with this privacy notice. We have data sharing agreements in place with Scottish Gymnastics and Welsh Gymnastics which reflect the following arrangements:

* **Scottish Gymnastics**
British Gymnastics and Scottish Gymnastics work together for the purposes of supporting members to maintain or work towards coaching qualifications, judging awards or to hold or become a licensed member of our education workforce. If you are a Scottish Gymnastics member, you will hold British Gymnastics membership by association, and we will work with Scottish Gymnastics for the purposes of supporting Scottish Gymnastics members to revalidate or work towards new qualifications/awards. Together we maintain a shared register of existing qualifications and awards and licensed workforce members. We will also maintain your individual progress record when you are working towards a new qualification as well as provide you with access to the information and services you need to achieve and maintain your qualifications and workforce license.
[[Click here to access Scottish Gymnastics Privacy Notice](https://www.scottishgymnastics.org/privacy)]
* **Welsh Gymnastics**
If you are registered with a Welsh club, you become a member of both Welsh Gymnastics and British Gymnastics. We jointly agree the ways in which the information about you that will be used. Your equality profile information will not share with Welsh Gymnastics but the information will be used to provide anonymous statistical reports. In addition, Welsh Gymnastics and British Gymnastics jointly control the use of personal information provided in respect of any safeguarding concerns relating to Welsh Gymnastics members. If you are a coach, judge or member of the education workforce, we will also share with Welsh Gymnastics details of any qualifications or awards, training records and workforce license status and/or if you have been approved to work or volunteer in the sport following completion of a criminal record check.
[[Click here to access Welsh Gymnastics Privacy Notice](https://www.welshgymnastics.org/document-library/?type=59)]

The following organisations are also British Gymnastics affiliates:

* 10 English Regional Gymnastics Associations;
* Isle of Man Gymnastics Association; and
* British Schools Gymnastics Association.

When you join British Gymnastics directly, you can, if you wish, attach your membership to the British Gymnastics registered club/s where you participate in gymnastics.
[[Click here for our membership T & Cs](https://www.british-gymnastics.org/documents/footer-menu-items/governance-documents/7365-membership-rules-dec15/file)]

**Services we provided to others**

We provide, on request, a range of services on behalf of clubs, affiliated and subsidiary organisations that involve us processing personal data on behalf of these organisations. These services include:

* A membership system for affiliated organisations and registered clubs to hold information they need to collect about their members.
* An online competition or event entry system for affiliated organisations.
* Website and support services for affiliated organisations.
* HR, IT and other support services for our subsidiary and some affiliated organisations.

In these circumstances, the third-party organisation is responsible for how the information you provide is used and we will provide their privacy notices at the point that your personal information is collected. British Gymnastics is responsible for ensuring the data is held securely. British Gymnastics will not make use of this data for any other purpose and will ensure it is processed in accordance with data protection laws.

Our membership privacy notice explains:

* **What information we collect about you**
* **How we use your information for contractual purposes**
* **How we use information about you for legitimate purposes**
* **Marketing**
* **Other lawful reasons for using information about you**
* **Why we share information about you**
* **How long we keep information about you**
* **Transfers of data out of the European Economic Area (EEA)**
* **Your rights in respect of your personal information**
* **Changes to our privacy notice**
* **How to contact us**

**What information we collect about you**

When you register as a British Gymnastics member or renew your membership (or you register or renew on behalf of a child under the age of 16 or on behalf of an adult who does not have the capacity to manage their own personal data), we need to collect information about you. Some of this information is essential for us in order to provide your membership but it is your choice whether you provide all the information we have requested. If you don’t provide this information, it may affect our ability to provide all the membership benefits to you.

* Your name (and the name of the member if they are under 16 or adult who does not have the capacity to manage their own data) and preferred title.
* Date of birth and gender.
* Contact details (telephone, email and postal address).
* Details of any assistance accessed to complete registration independently.
* Confirmation that a member over 18 does not have the mental capacity to complete the membership process.
* Role(s) you undertake in the sport e.g. parent, gymnast, coach, judge, club manager and welfare officer.
* Whether you are a competitive gymnast and the home country you would represent.
* Name of any club(s) to which you wish to be attached (if this is required).
* The nature of your participation in the sport. This includes the number of hours and days you spend participating in the sport and the type of gymnastics in which you/your child participate/s.
* Your equality profile (or the member’s profile if you are registering on someone else’s behalf). This includes sex, gender identity, disability, ethnicity/race, religion/belief and sexual orientation (only for members who complete their own membership).
* IP address and other electronic identifiers.
Your account is web-based so when you log in, the system keeps a record of your Internet Protocol (IP) address (a unique set of numbers that identifies one or more devices on a computer network), browser identifier and the time of access.

[[Click here for information on the cookies we use on our website](https://www.british-gymnastics.org/cookie-policy)]

We may also collect the following other information about you. Most of this information will come directly from you or will be provided by your registered club. Where information is not provided by you or your club, we will state the likely source.

* Payment and transactional information (if you are paying for your own membership or any other British Gymnastics services). We do not store any credit/debit card details.
* Records of communications from, to or relating to you.
* Medical Screening results completed by medical practitioners at your request.
* Accident or incident reports.
* Details of gymnastics qualifications/awards you hold and training you have completed.
* Details relating to criminal record checks (disclosure number and date of the check), ID documents and any criminal convictions, cautions or official information and warnings and other relevant additional information e.g. references from former employers or information from probation services.

As a member of British Gymnastics, you can access other activities and services. If you enter a British Gymnastics competition we may need to collect the following information about you:

* Confirm that you hold a valid UK passport or Nationality if you are not a UK passport holder.
* Disability classification (if you are competing in a disability event).
* Photographs and video footage and results.

Some of the activities we provide require us to process additional information about you including:

* Prior knowledge, skills and experience and expectations.
* Emergency contact details.
* Medical, health and disabilities information.
* Specific support needs.
* Dietary requirements and allergies.
* Passport details if you have registered to take part in event outside the UK.
* Clothing sizes.
* Social media messaging service contact details.
* Your feedback/evaluation of an activity.

If you are supporting us to provide any of our gymnastics activities, we may also collect:

* Additional information about your knowledge, skills and experience.
* Role preferences and availability.

In some cases, we will be unable to provide our services unless you provide the requested information but we will tell you at the point of collection if any of the information we are requesting is optional.

**How we use your information for contractual purposes**

When you register as a British Gymnastics member or ask us to provide another service such as a coaching or judging qualification or any other learning activity such as a coaching clinic, talent camp or student enrichment programme or you enter a competition (lower level events aimed at bronze members) or non-competitive event, we need to process your information because it is necessary to provide the service. This includes:

* Confirming that you have signed up for the service and to inform you of arrangements relating to that service;
* Confirming that you comply with any registration/entry requirements and terms and conditions, including notifying you of any specific changes;
* Where relevant, telling you when it is time to renew or re-register;
* Informing you of results where relevant;
* Processing payments or sending you receipts as required.

**Medical information and disabilities**

For certain events or activities, we ask you to provide information about any relevant disabilities and medical conditions. We have a legal obligation under the Equality Act 2010 to make any reasonable adjustment for individuals with disabilities who need this to be able to access the requested service. We also have a duty of care to ensure it is safe for you or your child to take part in our activities and to keep you/them safe while participating or in an emergency. With your explicit consent, we will review any information you provide and if required we will contact you for further information to enable us to understand how to meet your needs and to complete any required risk assessments. In most cases, we will only retain this information for six months after the event, unless there is another lawful reason why we need to continue to hold this information e.g. for insurance or other claims purposes.

Additional information about specific services is provided below.

[**Registering as a member**](https://www.british-gymnastics.org/members-privacy-policy#panel-a1)

[**Member safeguarding requirements**](https://www.british-gymnastics.org/members-privacy-policy#panel-a2)

[**Medical Screening**](https://www.british-gymnastics.org/members-privacy-policy#panel-a3)

[**Gymnastics competitions**](https://www.british-gymnastics.org/members-privacy-policy#panel-a4)

[**Competitions for members with disabilities**](https://www.british-gymnastics.org/members-privacy-policy#panel-a5)

[**Coaching and Judging Courses**](https://www.british-gymnastics.org/members-privacy-policy#panel-a6)

[**International festivals and events**](https://www.british-gymnastics.org/members-privacy-policy#panel-a7)

[**Promotions, prize draws or competition**](https://www.british-gymnastics.org/members-privacy-policy#panel-a8)

**Other processing activities we undertake to perform or enter into a contract with you**

We undertake other activities where we need additional information about you. These include:

* National Squads
* Apprenticeship Programme
* Contracting your services as part of our Education Workforce
* Using our website

Although many aspects of this privacy notice will be applicable, we have separate privacy notices that outlines all information about you that we need to collect, use and share relating to these activities.

**How we use information about you for legitimate purposes**

We process personal information about you where we have a legitimate interest to do so. In some cases, this may require us to collect additional information from you or from other sources. The purposes include:

[**Disclosing your information organisations that affiliate or register with British Gymnastics**](https://www.british-gymnastics.org/members-privacy-policy#panel-b1)

[**Disclosing your information to GEL so you can use your member discount**](https://www.british-gymnastics.org/members-privacy-policy#panel-b2)

[**Responding to your questions, requests and support needs you raise in person or by telephone, email or letter or via our website including our online chat service**](https://www.british-gymnastics.org/members-privacy-policy#panel-b3)

[**Monitoring the effectiveness of our communications and IT systems**](https://www.british-gymnastics.org/members-privacy-policy#panel-b4)

[**Understanding member needs and monitoring the nature and level of participation**](https://www.british-gymnastics.org/members-privacy-policy#panel-b5)

[**Statistical monitoring of the equality profile of our membership to assess whether our services are accessible and to measure the impact of interventions to promote inclusion**](https://www.british-gymnastics.org/members-privacy-policy#panel-b6)

[**Sending you information by post that we think will be of interest to you, including from our affiliated and partner organisations**](https://www.british-gymnastics.org/members-privacy-policy#panel-b7)

[**Seeking feedback from you about our services**](https://www.british-gymnastics.org/members-privacy-policy#panel-b8)

[**Understanding what other gymnastics activities or products are of interest to our members**](https://www.british-gymnastics.org/members-privacy-policy#panel-b9)

[**Inviting you to participate in British Gymnastics research**](https://www.british-gymnastics.org/members-privacy-policy#panel-b10)

[**Recognising the contribution of British Gymnastics members**](https://www.british-gymnastics.org/members-privacy-policy#panel-b11)

[**Presenting and taking photograph and videos at our large public events**](https://www.british-gymnastics.org/members-privacy-policy#panel-b12)

[**Inviting you to British Gymnastics meetings or to present, coach, judge, train or officiate at relevant British Gymnastics activities or events**](https://www.british-gymnastics.org/members-privacy-policy#panel-b13)

[**To respond to complaints, concerns or allegations about anyone involved in the delivery of gymnastics activity**](https://www.british-gymnastics.org/members-privacy-policy#panel-b14)

We have carried out legitimate interest assessments (LIA) to ensure that the above processing activities are necessary and are carried out in a way that ensures a balance our interests and those of any other relevant third parties in processing information about you and your own individual interests, rights and freedoms in respect of this information. As part of these assessments, we have identified appropriate safeguards, especially to protect the interest of data subjects who are children. We can provide details of these assessments on request.

You have the right to object to any of the processing we undertake based on legitimate interests based on your own individual circumstances. We will stop processing your personal data unless we can demonstrate compelling legitimate grounds for the processing, which override your individual interests, rights and freedoms or we need to continue to process your information in connection with a legal claim. If you wish to object to any of the processing activities we undertake based on legitimate interests, you can contact our Data Protection Officer (DPO) or use our [objections form](https://www.british-gymnastics.org/objection-to-data-processing). Please bear in mind that in some cases, if you object this may affect our ability to carry out the tasks above for your benefit.

**Marketing**

With your consent, we will use your email address to send you the latest news and information about gymnastics that we believe may be of interest to you. We use Mailchimp, a third-party provider to manage our marketing communications.

It is our legitimate interest to ensure that we only send you information that we believe with be of interest to you. By looking at your role and participation profile as well as any other relevant personal information you have provided, we can identify news, offers and services that are most likely to be most relevant and will meet your needs as a member.

These communications will include relevant newsletters and magazines, information about opportunities, products, services and events and relevant information from our affiliated and partner organisations.

When we send you marketing communications, we monitor whether you have opened the communication and clicked on any included links. This will enable us to track and analyse your level of engagement/interest in the communication we are sending you and will provide us with further insight on what type of communications are most of interest to you.

If you agree to marketing, and later change your mind, you can opt out at any point, by amending your settings in ‘my account’. Alternatively, you can use the ‘unsubscribe’ link at the end of the electronic communication but this will unsubscribe you from all marketing communications. Please note that you may still receive communications for a short period after changing your preferences but this will stop as soon as our systems are updated.

**Marketing from Gymnastics Enterprises Ltd (GEL)**

With your consent, you can also receive information with GEL by email about their gymnastics merchandise, resources and events. If you agree to receiving marketing from GEL and later change your mind, you can unsubscribe using the link in the GEL communication or withdraw your consent by amending your marketing preferences in ‘my account’.
[Click here to access GEL Privacy Notice](https://www.british-gymnastics.org/shop/privacy-policy)

**Marketing from the British Gymnastics Foundation (BGF)**

With your consent, we will also share your information with BGF who may send you emails about their charitable objectives and activities. BGF have their own database so once your information is shared with BGF, you will need to them if you wish them to delete your information. Alternatively, you can unsubscribe from these emails using the link at the end of the BGF email.
[Click here to access BGF Privacy Notice](https://britishgymnasticsfoundation.org/privacy-statement/)

**Other lawful reasons for using information about you**

We may need to process information about you to comply with a legal or statutory obligation. This includes but is not limited to:

* Accounting, auditing, compliance and administration practices.
* To maintain records of amendments to consents and to create suppression lists to ensure people who object to processing are excluded from the relevant processing activity.

**Special categories of personal data**

Special categories of personal data are a category of information that is more sensitive and requires greater protection. Some of the information we process falls into this category (e.g. health/medical data or any information you provide to us about a disability and some equality profile data). It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will only process this type of information if one of the following applies:

* We have your explicit consent or you have made the information public;
* It is in your vital interests and you are unable to provide consent e.g. if you are unconscious or do not have sufficient mental capacity.
* We are required to do so to establish, exercise or defend a legal claim;
* We are required to do so to comply with employment or social security or social protection law; or
* There is a substantial public interest in doing so.

**Why we share information about you**

We may need to share limited personal information with the following organisations:

[**Statutory/regulatory authorities and other organisations**](https://www.british-gymnastics.org/members-privacy-policy#panel-c1)

[**Professional and legal advisors**](https://www.british-gymnastics.org/members-privacy-policy#panel-c2)

[**External service providers who are contracted to provide specific services on our behalf**](https://www.british-gymnastics.org/members-privacy-policy#panel-c3)

**How long we keep information about you**

We will retain your personal data only as necessary to provide the services to which you have subscribed or where we have another legitimate and lawful reason to do so. At your request or if you do not renew your membership within two years we will delete any information that we no longer have a reason to retain, unless you ask us not to.

We retain some information to comply with our legal obligations such as financial/accounting records which need to be retained for six years in line with UK tax law.

We need to retain sufficient information about you in the event of an insurance claim in the future so that we can identify you and confirm that you held membership for the relevant period. We may need to retain other information to comply with legal or statutory requirements, some of which are highlighted in this notice. In addition, we may also need to retain information relating to your conduct as part of our regulatory responsibilities, the times of which will vary dependent on the nature of the concern and whether this is any potential risk to others associated with these concerns.

As the reason for retaining certain types of information varies, the retention periods can vary significantly. Please contact our Data Protection Officer (DPO) if you require any further information on specific retention periods.

**Transfers of data out of the EEA**

We transfer your personal information to third-party data processors who are based in the countries outside the European Economic Area (EEA).

We use some US-based companies that provide services such as data analytics, marketing communication and our video sharing platform. We only use US-based organisations that are self-certified as adhering to the EU-US Privacy Shield.

We will not transfer your information to any processors based in other countries outside the EEA unless there is a European Commission adequacy decision for the specific country to which the data is transferred or where we can be certain that there are adequate safeguards provided for your information and individual rights standards that meet the GDPR requirements.

Please see the section above on **International festivals and Events** which explains when we will transfer your information to enable you to participate in an event outside the EEA.

Please contact our Data Protection Officer (DPO) if you require any further information relating to international transfers.

**Your rights in respect of your personal information**

You have important rights under data protection law. In summary these include:

* **To be informed about how your information is processed**
We hope that the information in our privacy notice has achieved this but please contact our DPO if there is any additional information you require.
* **To access any personal data held about you**
You have the right to see the personal information we hold about you. This is called a Data Subject Access Request (DSAR/SAR). You can log in to your account at any time to view the information we hold about you on your membership account.

You can also request a copy of any other personal information that we hold by writing to our DPO. If you wish, you can make your request using the [British Gymnastics DSAR form](https://www.british-gymnastics.org/DSAR).

If we do hold information about you, we will:
- Describe the information we hold and tell you why we are holding it;
- Tell you who it could be shared with; and
- Provide you with a copy of the requested information in an easy to understand format.

Alternatively, if your request is straight forward, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone where appropriate. If the information relates to a specific activity, you can contact the relevant British Gymnastics department that is responsible for the activity.
* **To have your data rectified if it is inaccurate**
If we do hold information about you, you can ask us to correct or amend any inaccurate or incomplete information by contacting us in writing at the address below. We will either make the requested amendments or provide an explanation as to why we are not making changes.
* **To have your data deleted (except if there is a valid lawful reason to retain it)**
You can also log in at any point to amend or delete some of the information held in your membership account that has changed or is no longer accurate.

You have a right to request the deletion of your information in advance of the above retention periods. We will delete this information unless there is a lawful reason for the information to be retained.

Where you have given us your consent for your personal information to be used for a particular purpose, you have the right to withdraw this consent at any time. You may do so by contacting us using the contact details below or in the case of marketing, by amending your preferences in your member account. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.
* **To have your information restricted or blocked from processing**
If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.
* **To portability**
This means where the information you have provided is moved or transferred to an alternative provider. If you move clubs, you can amend the club to which you are attached at any time in your membership account settings. If you wish to move clubs, you can transfer your information to another club by logging into ‘My Account’ on the British Gymnastics system. Alternatively, if you leave your club, the information you provided on behalf of the club will be archived on the British Gymnastics system for 60 days and will be deleted after this has lapsed. During this period, you can still transfer the relevant information to another club.
* **To object to:**
	+ **Any processing based on legitimate interests**
	+ **Any automated decision making including profiling** (which we only undertake for marketing activities).
	+ **Your personal information being used for direct marketing activities**
	If you object to any direct marketing we undertake, including any profiling we undertake related to this activity (where we decide that a communication would be of interest based on your membership profile) we will no longer use your information for these purposes.

[Click here to learn more about your rights](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/).

To exercise any of these rights or if you have any questions about our membership privacy notice please contact our Data Protection Officer (DPO) on the contact details provided below.

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR or have any wider concerns about our compliance with data protection law. You can do so by calling the ICO helpline on 0303 123 1113 or via their website.

**Changes to our privacy notices**

We keep our privacy notices under regular review. This notice was last updated on 24th May 2018.

**How to contact us**

We hope that you have found this information helpful but if you have any questions or concerns, please contact our Data Protection Officer (DPO) who will be pleased to help you.

Data Protection Officer
British Gymnastics
Lilleshall NSC
Nr Newport
Shropshire
TF10 9NB data.protection@british-gymnastics.org