

## **South West (SWAGA) privacy policy**

SWAGA is the data controller and is committed to complying with our legal responsibilities under data law and ensuring your personal information is kept secure.

It is important that you read this privacy notice carefully as it contains key information about how and why we process (collect, store, use and share) information about you and your associated rights.

### **About us**

SWAGA is a 'not for profit' organisation. Our members are gymnastics clubs who affiliate to the Region. We provide a number of benefits to affiliated clubs including the opportunity for members of the clubs to participate in our activities, which include competitions, squads, clinics, conferences and other learning and development activities.

### **Our relationship with British Gymnastics**

We affiliate to British Gymnastics (BG) who governs the sport and offers competitions and events in which our Regional teams may participate.

British Gymnastics provides our website, Facebook account and online entry system for competitions which requires them to handle personal information on our behalf. British Gymnastics is contractually required to ensure your information is secure and to only use the information to provide the services we have requested.

British Gymnastics provides information with us as required for the sport to operate. This is necessary as individuals who participate in our events [usually] need to hold British Gymnastics membership. We also need to confirm with British Gymnastics that those individuals who are signed up for one of our activities meet the required criteria for participation such as age and qualification and any mandatory safeguarding requirements and to share any information with British Gymnastics in line with the regulatory requirements to which we are subject as an affiliated association of British Gymnastics.

### **How we use personal information**

We collect personal information about the members of our affiliated clubs including coaches, gymnasts (and sometime people with parental responsibility for the gymnasts) and officials, Regional committee members and volunteers and people who provide services on our behalf. Our core purposes include:

- To conduct Association business and manage your Regional affiliation informing you about activities to which your club members can participate;
- To provide gymnastics events, competitions and squads and to invite individuals to participate, judge, coach, officiate or present at relevant events;
- To inform you of the Regional activities to which are part of your affiliation benefits;
- To support learning and development of those involved in gymnastics in the Region; and
- To comply with applicable laws and protect legitimate regional interests and legal rights. This includes, but is not limited to the use of your information relating to legal claims and regulatory and compliance activity.

- To support our county associations, we may provide information on the names and contact details of judges and confirm all participants meet the criteria to participate in County-level events.

## **Affiliation to the Region**

If you affiliate your club to the region, we will need the name and contact details of the person registering the club. [if you are processing bank details, you need to include that too]

We will use this information to process and communicate with you about your club affiliation, invite you to participate and vote in our AGM and to send you information about the gymnastics activities and other benefits and services to which your affiliation provides.

If you would rather we do not send you this information by email, you can also find this information on our website.

If you do not renew your affiliation, we will delete your information after one year apart from the details of any financial transactions which we need to retain for 6 years after the end of the relevant financial year, in the event of a tax or banking enquiry.

## **Regional Events**

Anyone who is a member of a club registered to the region who meets any relevant participation criteria can register for Regional events. We will require your name, contact details and club and confirmation that you meet any entry requirements. We will use this information only to administer the event and where relevant provide certification. We may ask you to complete an evaluation form, which you can do so anonymously unless you want us to contact you about the feedback you have provided.

We will delete any entry information about events that you have attended after one year. With your consent we will use your contact details to send you information about other events that we believe may be of interest to you.

## **Regional Competitions**

Gymnastic clubs who are registered to the Region can enter their gymnasts into our regional competitions. To enter a gymnast into a competition, we may need their name, DOB and gender especially if you submit via the British Gymnastics online competition entry system, which will automatically verify that the gymnast and coaches hold British Gymnastics membership and meet the required entry criteria. The results of our competitions are also published. Any publication of images of children will be done in accordance with the British Gymnastics Safeguarding Policy and guidance on use of images.

It is the club's responsibility to ensure that the gymnast and where relevant the person with parental responsibility has agreed for you to enter them/their child into the event and understand how their personal information will be used.

## **Regional Squads and residential events**

If a gymnast is selected to participate in squads, we will need to collect the gymnast's contact details and emergency contacts and any relevant lifestyle information including specific needs and dietary requirements (if required).

We may also collect information about potential and existing squad member performance, including results in competitions, trials and assessments.

We will only hold this information while the gymnast is a current member of squad except where we are obliged to retain the information as part of a legal or insurance claim.

## **Squads and other relevant activities**

We recognise our responsibility to ensure individuals with disabilities can access our services and anyone with a relevant medical condition is not harmed through their participation in our activities. We may need to ask participants in some of our activities to provide details of any relevant medical conditions/injuries and disabilities.

We will use this information for the following purposes:

- To undertake risk assessments and make any appropriate adaptations e.g. to training programmes and to ensure your safety whilst taking part in any activities; and
- To make reasonable adjustments to support people with disabilities to access the services we provide.

We will only hold this information whilst you continue to participate in the activity unless we are required to retain this information in connection with a legal claim.

## **Filming and taking photos at regional events**

At our large-scale regional competitions and events we may film or take photos at the event as part of our legitimate interest to promote the Region's activities. We may publish this footage on our website, social media account and in our communications. Any film and photos of children will be published in line with our safeguarding policy. On occasion, we may also film gymnasts at our regional squads for coaching purposes. Occasionally there may be a professional photographer approved by the region taking photos at events.

You have the right to object to any processing we undertake based on legitimate interests. Please let us know if you do not wish to be filmed or photographed or do not want your image to be published.

We will delete any images over 10 years old unless we consider them to be of public interest and should consequently be archived for historical purposes. Where images have been published on social media, these platform providers may continue to process your data after our retention period has lapsed.

Videos taken at training sessions for individual coaching purposes will be retained only for as long as they are required for that purpose.

If we wish to film or take photos at small regional events such as learning events or squad training or for any other purpose e.g. publication, we will ask for your consent.

### **Website**

Our website is provided by British Gymnastics who is responsible for ensuring the site is secure. We do not use any tracking or analytics on our website. When you use our website, your IP address is logged by the British Gymnastics webserver but the Region is not able to identify you from this information alone.

### **Sharing your information**

We have a legitimate interest in sharing personal information with British Gymnastics to ensure the sport is safe and well-governed and where relevant to access support and advice.

We will not otherwise share your information with any other organisations unless we have your consent to do or to comply with a legal obligation or in exceptional/emergency circumstances where we believe that the sharing of information about you is vital to protect the data subject or another person including to safeguarding and child or another individual who is at risk. Any information that is shared will be strictly limited to what is required to ensure those at risk are protected from harm and will be carried out in accordance with the law and relevant government guidance.

### **Reasons we collect and use your personal information**

The legal reasons we rely on to process information about you or your child are as follows:

- **Performance of a contract** – where you sign up to a service we provide, we will need to use your personal information to provide that service.
- **Legal obligations** – we need to process your information to comply with legal obligations. This includes maintaining account and asking you to provide information about any disabilities or medical information so that we can support access to our services and keep people safe.
- **Consent** – To send our e-newsletter and to take and publish photographs at small regional events.

We also process personal information for the following **Legitimate interests**:

- To respond to any general queries and complaints;
- To conduct committee and other Regional business;
- To support our squad gymnasts by monitoring performance and individual needs;
- To provide information to British Gymnastics for regulatory and operations purposes and to enable the Region to participate in relevant British Gymnastics activities;
- To hold emergency contact information for relevant individuals;
- To promote our activities by publishing information, photographs from our regional events , news and competition results on our website and through social media; and
- To respond to misconduct and safeguarding concerns.

If the information we are processing is a special category of data (e.g. health/medical data), in addition to the legal bases identified above, we require a separate condition for processing this type of data. We would usually rely on your explicit consent but may also process this type of information include where the processing is required to establish, exercise or defend a legal claim, to comply with employment law or where there is a substantial public interest.

## **Transfers of data out of the EEA**

We may transfer your personal information to countries which are located outside the European Economic Area (EEA) for the follow purposes:

- In order to enter competitions and events

We will not transfer your information to any country or organisation 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

## **Individual rights**

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

- To be informed about how your information is processed (set out above).
- To access any personal data held about you.
- To have your data rectified if it is inaccurate.
- To have your data deleted (except if there is a valid lawful reason to retain it).
- To have your information restricted or blocked from processing.
- To portability
- To object to direct marketing and any processing based on legitimate interests.
- To object to automated individual decision-making and profiling (we do not undertake these activities)

[Click her to learn more about your rights](#)

To exercise any of your rights or if you have any questions about our privacy policy please contact:

Chairperson of the region

If you are concerned about the way we are processing your personal information, you have a right to complain to the ICO who can be contacted by telephone on 0303 123 1113.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine reason to need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach and will notify you and the ICO of any personal data breaches in line with our legal obligations.

## **Changes to the privacy notice**

We keep our privacy notices under regular review. This privacy notice was published on 23<sup>rd</sup> May and last updated on 23<sup>rd</sup> May

We may change this privacy notice from time to time, when we do we will inform you via a link on the regional website.