

BRITISH GYMNASTICS PRIVACY NOTICE – NON-FUNDED ATHLETE

This Privacy Notice takes effect on 30/03/2020.

Your privacy is extremely important to British Gymnastics and we are fully committed to providing you with a clear and transparent explanation about how we collect and process information about you when you are a member of the British Gymnastics Performance Programme. 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.

When processing your personal information, we are regulated under the General Data Protection Regulation and are responsible as 'controller' of your information for the purposes of this law and any other applicable data protection law.

As a Performance Programme (PP) member you may have access to some athlete support services. These services are provided by the English Institute of Sport Limited (EIS) to help optimise your performance in training and competition and to improve your health and wellbeing. The EIS is a grant funded by UK Sport and contracted by British Gymnastics to provide you with these services, where applicable.

The provision of the PP in its entirety requires us and the EIS, who are 'controllers' in their own right to process your personal information and share information between the two organisations, where necessary to administer and meet the legitimate aims of the PP.

The personal information we collect about you

As a member of the PP, we need to process the following personal information:

- Contact details
- Date of Birth (DOB)
- Personal coach details
- Next of Kin/Emergency contact details
- Education information – including school name, address, enrolled courses
- Clothing sizes
- Passport information
- Video and photographs
- Competition and control event results
- Training and technical data
- Health and medical information

All the above information is necessary to enable you to access the PP, except your passport details, which will only be required if you are selected to participate in an international event and/or we need to apply for an Federation International de Gymnastics (FIG) License on your behalf.

Your personal information will only be made available to those that need to know this information to undertake their role. Any information provided will be limited

to what is necessary for the specific purposes for which the individual uses your information. The staff members that will have access to information about you include the Executive Director – Sport, Performance Director, Head of Performance Programmes and the relevant Performance Managers, Sport Programme Officers and National Coaches. Other staff and volunteers who are appointed in the roles at national and international events will also require access to relevant information about you including the Head of Delegation, Welfare Officer, Team Manager, Team Coaches and Technical Committees.

We will also access information from CRM, our membership database, such as details of your club.

Click here for our [membership privacy notice](#) for more information on how we use information you provide to us when you become a member of British Gymnastics.

Information collected from other sources

If you access health and medical services through the PP, the EIS may collect information about you which is normally stored on their Performance Data Management System (PDMS). British Gymnastics medical staff can also input information about you onto the PDMS and your information may also be shared with British Gymnastics through this system.

The information processed by the EIS includes:

- Training and technical performance data
- Medical information relating to illness and injury surveillance and rehabilitation
- Where applicable, sport science and medicine data and status updates including Strength & Conditioning, Psychology, Physiotherapy, Medical, Performance Analysis, Nutrition, Biomechanics, Physiology and Performance Lifestyle, Soft Tissue Therapy, athlete reported availability, wellness/sickness information, date and details of injury and related training status.

In the case of health (information relating to physical or mental health including your access to specific health services) and any genetic or biometric data that is held about you by the EIS, the EIS will only share this information with British Gymnastics with your explicit consent or where there is another specific legal condition that provides the basis for this information to be shared.

You do not have to give your consent and your refusal to give permission for health information to be shared with us will not affect your inclusion in the PP or selection for any representative events. You can withdraw your consent at any point and have a choice as to whether new health information relating to a particular medical consultation is shared with British Gymnastics at the time of the consultation. If you wish to withdraw your consent you should contact PDMS Admin at the EIS (PDMS.Admin@eis2win.co.uk). You may request that your decision to withdraw your consent or not consent to the disclosure of specific health information is not shared with British Gymnastics.

Click here for the [EIS Athlete Privacy Notice](#) that provides detailed information about how the EIS uses your personal information.

How British Gymnastics uses your information for contractual purposes

When you join the PP, we need to process your information because it is necessary to provide the service. This includes:

- To communicate with you about the PP and any relevant activities.
- To sign you up for health and medical services where applicable. When you join the PP, we may share your information with the EIS for the purpose of registering you for the medical and support services.
- To obtain a FIG licence that is required for competing in international events.
- To implement and monitor Anti-Doping Policy by maintaining records of completed anti-doping education sessions, testing results and sanctions and any related communication from UKAD/FIG/WADA.
- To provide information for media and PR purposes to promote PP athletes and their achievements and the wider PP successes and press releases on injury, which are written by the medical team and reviewed and agreed by the athlete.

Occasionally we may wish to publish official profiles, personal interviews and features on big screens at Events. This could include your photo, full name, age, home town, home club (and previous clubs), personal coach name, previous event results, social media handles, personal website addresses and fan mail addresses. Performance data such as statistics around speed, strength, force, heart rate, weight and height etc. will only be used with your explicit consent

How we use information about you for legitimate purposes

We process personal information about you where we have a legitimate interest to do so. The purposes include:

- To maintain and enable effective communication with athletes, coaches, performance staff, the EIS and parents/guardians.
- To enable logistical arrangements for athletes to attend training camps and Competitions (domestic and international) including clothing, travel and accommodation requirements.
- To maintain records of next of kin/emergency contacts for programme gymnasts
- To inform selection decisions for national squads and Competitions including (but not limited to) European Championships, World Championships and

other major championships.

We use information about your performance in competitions and control events together with information potentially provided by the EIS to inform squad and competition selection decisions. We also use information about you to plot your career trajectory and likelihood of future medal success.

- To track and monitor training and competition performance, to ensure we can tailor the support provided to you to achieve the performance goals.

Our Performance Staff need to use information that we hold potentially together with information provided by the EIS to support individual athlete planning, enabling informed decisions relating to individual goal setting, training monitoring and competition evaluation to carefully track and monitor the effectiveness of the PP. This helps us to best meet your individual needs so that you can achieve maximum success.

- To monitor athlete trajectories and likelihood of medal success
- To deal with selection appeals
- To film and take photographs for promotional and training purposes
- To review and monitor the quality and impact of the services and funding provided to PP participants.
- To monitor the return on investment from funding and support provided to you
- To prepare anonymous statistical reports relating to the profile of PP participants

We may prepare anonymous statistical reports of the profile of PP athletes using information provided to British Gymnastics at membership renewal. For example, we may report on the diversity of our members in respect of age, sex, gender identity, disability, ethnicity/race, religion or belief and sexual orientation as part of our equality strategy using information provided at membership registration. We report on specific groups of members such as coaches and gymnasts and may report on PP gymnasts. We are aware that some of this information is very sensitive and will never use this information in a way that can identify individuals.

Click here for our [membership privacy notice](#) that provides more information about how we use your information for this purpose.

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 DPO. 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.

Legal conditions for medical and health information

It is unlawful for organisations to process this type of information unless an additional legal condition applies. We will usually only process medical or health information or any other sensitive lifestyle information if we have your explicit consent to do so. However, we may also process this information if one of the following applies:

- You have made the information public;
- For anonymous statistical purposes;
- 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. In the UK substantial public interests include:
 - Safeguarding of children and individuals at risk
 - Anti-doping in sport
 - Standards of behaviour in sport

Sharing Your personal data

We routinely share your personal data with the following third party organisations:

- Sports Aid for the purpose of applying for funding to support you.
- FIG to apply for your FIG license which is required for participation in international competition and the FIG, UEG, IOC and other relevant competition organisers as required for you to participate in events to which you have been selected.
- If you are in contention for a place in the World Games, European Games or other Major Championships, we will share your information with respective organising committees. We will need to share your personal information, including your contact details, clothing size and passport information. We will not share any health information.
- UK Anti-Doping (UKAD) for the purposes of implementing and ensuring compliance with the National Anti-Doping Policy and the Anti-Doping Rules. You will already be need to share your personal information with UKAD as this is a requirement of the World Anti-Doping Code and Anti-Doping Rules.

UKAD sign up to the International Standard for the Protection and Privacy of Personal Information, which can be found on <http://www.ukad.org.uk/resources/document/international-standard-for-the-protection>.

- Personal Coaches – we will share information as required to support your training and wider needs. We will not share any health information with your personal coach unless we have your explicit consent.

We or the EIS may share information about you with other relevant third party organisations, such as the Home Country Sports Councils/Institutes if there is a legitimate interest in doing so.

We may need to share information about you to comply with a legal, statutory or regulatory obligation. Your information is only shared where required, necessary, proportionate and lawful with relevant organisation such as the Police, Local Authority, NHS and other Statutory bodies such as the Department of Work & Pensions, Health & Safety Executive and the Gambling Commission (Sports Betting Integrity Unit).

Third parties we engage to provide medical/physio services

In addition to the EIS, we may on occasion engage other third-parties to provide medical support services. Where we contract the services of a medical professional, they will be the data controller in respect of any information which you provide to them relating to medical diagnosis and treatment. Consistent with when these services are provided by the EIS, this information will only be shared with British Gymnastics with your explicit consent or where there is another specific legal condition that provides the basis for this information to be shared. You should confirm your wishes at the consultation.

We may also use third-parties to provide other services such as photography and filming and IT services and cloud storage. Where we share your personal information with a third-party service provider, we will limit the personal data that is shared to the minimum required to provide the service and the provider will only be able to use personal data for the specific purposes for which it was shared. If we stop using the service, the third-party provider must delete or securely return your information to us.

Except for the above, we will not share your information with any other organisations unless we have your consent to do.

Transfer of your information 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 Microsoft. We only use US-based organisations that are self-certified as adhering to the EU-US Privacy Shield, which means they provide an adequate level of protection for your information.

We may also need to transfer your personal information outside the UK if you are selected to represent British Gymnastics at an international event. Some competitions may take place in countries outside the European Economic Area that do not have the same data protection laws as the United Kingdom and EEA.

Where the European Commission has not given a formal adequacy decision for the specific country to which the data is transferred or where we cannot be certain that the level of protection provided for your information and individual rights are to the standards provided under the GDPR. We will only transfer your personal information if it is necessary for the performance of this agreement providing that it involves a one-off transfer of a limited number of individual's data, who have all been informed of the associated risks. We will also liaise with the FIG and/or the relevant national federation to ensure any reasonable safeguards to minimise risks are implemented.

Retention

British Gymnastics will store personal data based on the following timescales:

RECORD	RETENTION
Passport	1 year after withdrawal from the WCP Programme
Parent/ emergency contact info	1 year after withdrawal from the WCP Programme
Education	1 year after withdrawal from the WCP Programme
Individual competition results	4 years after withdrawal from the WCP Programme
Training data and control event results	4 years after withdrawal from the WCP Programme
Clothing Sizes	1 year after withdrawal from the WCP Programme

The EIS will retain your health information for up to 25 years after you have withdrawn from the PP. Any health or lifestyle information that has been provided to British Gymnastics that has been stored in other formats e.g. within a Head of Delegation pack or a confidential report will be deleted within 5 years of your withdrawal from the PP.

Your 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 decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you

- To object in certain other situations to our continued processing of your personal information

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

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

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 business 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. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

How to contact us

Please contact the DPO at British Gymnastics if you have any questions about this privacy notice or the information we hold about you.

Data Protection Officer
British Gymnastics
Lilleshall NSC
Nr Newport
Shropshire
TF10 9NB

Data.protection@british-gymnastics.org

How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information. However, if you remain concerned about

the way we are processing your personal information, you have a right to complain to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this privacy notice

This privacy notice was published last updated on 04/03/2020.

We may change this privacy notice from time to time, when we do we will inform you by email.