



PRIVACY POLICY

1. Purpose of our Privacy Policy:

Our Privacy Policy applies to the personal data that Crowborough Tri Club collects and uses.

Under the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2018 we are required to explain what information we collect and store about you, how and why we collect it and use it, whether we will share the information with anyone else, how we keep your information secure, as well as your rights and how to exercise them.

2. Who are we?

We are the Crowborough Tri Club and we are the Data Controller.

References in this Privacy Policy to “we”, “us” or “our” mean Crowborough Tri Club a British Triathlon affiliated club (Club Affiliation No: C2082)

3. Who is responsible for your data?

We control the ways your personal data are collected and the purposes for which your personal data are used by Crowborough Tri Club and are the “Data Controller” for the purposes of the GDPR 2018 and other applicable European Union data protection legislation.

Our Data Protection Officer is responsible for overseeing what we do with your information and monitoring our compliance with data protection laws. If you have any concerns or questions about our use of your personal data, you can contact our Data Protection Officer.

4. What information are we collecting?

When using the term “personal data” in our Privacy Policy, we mean information that relates to you and allows us to identify you, either directly or in combination with other information that we may hold.

The personal data which we collect and store about you will typically be:

- Your name and contact details such as postal address, email address and telephone numbers
- Your family details (such as emergency contact details)
- Information relating to your membership of Crowborough Tri Club including how you use our website and interact with us and when you make an online booking/purchase
- Information about your bookings including the date, time and the name of your class/course
- Information about your transaction, including your payment card details and/or bank details
- The communications you exchange with us (such as your emails, letters, calls, or your messages on our social media channels)
- When you take part in competitions
- When you obtain, renew or cancel your membership

Some of the information which we collect to deliver our objectives will be special categories of personal data (also called Sensitive Personal Data) to which greater protection is provided by the data protection laws. The information which falls within this category includes:

- Information about your age
- Information about your gender
- Information about your health, if you have a disability and/or medical condition that we need to know about in order to ensure your safety

We only collect this information where you have given your explicit consent, it is necessary, or you have deliberately made it public. By providing any sensitive personal data you explicitly agree that we may collect and use it in order to provide our services and in accordance with this Privacy Policy. If you do not allow us to process any sensitive personal data, this may mean we are unable to provide all or parts of the services you have requested from us.

5. How is the information collected?

The information which we process about you is collected:

- When you complete an online form, or update your details on our website
- When you submit an application form to us online or manually
- When you complete a survey for us
- When you contact us by email, post or telephone
- When you contact us via social media
- When you enter a triathlon competition organized by us
- Through cookies on our website (for further information visit www.aboutcookies.org or www.allaboutcookies.org . You can set your browser not to accept cookies and these websites tell you how to remove cookies from your browser. However, in a few cases some of our website features may not function as a result).

6. Why do we collect the information and how do we use it?

We are collecting your information to enable us to:

- Provide our services to you
- Manage your bookings
- Communicate with you and inform you about our news
- Contact you for administrative or operational reasons
- Provide you with information if you want it
- Administer our records
- Improve the website by monitoring how you use it
- Gather feedback to improve our services
- Respond to any feedback you send us, if you've asked us to
- Personalise and improve your customer experience
- Comply with our legal obligations

In limited circumstances we may use your information for a purpose other than those set out in this policy. If we intend to do so, we will provide you with information relating to that other purpose before using it for the new purpose.

7. What is the lawful basis for using your information?

In accordance with the data protection laws, we need a "lawful basis" for collecting and using information about you. The lawful basis on which we rely in order to use the information which we collect about you for the purposes set out in this policy will be:

- You have provided consent to our use of your information. You may withdraw your consent at any time and without giving any reason.
- Using your information is necessary to fulfil a contract you have with us, or because you have asked us to take specific steps.
- Using your information is necessary for us to pursue our legitimate interests as a triathlon club, which include arranging and organising training, competitions and other events.
- To comply with any applicable law.

8. Sharing your information

It may be necessary to share your information with our coaches, session leaders or a third party so we can provide a service to you. Our coaches & session leaders will not share your information with any other parties and will only be able to use the information when working on our behalf.

We do not share your contact details and other personal data with others, unless we have obtained your consent to do so.

Where we disclose your personal data to a third party, we require that third party to have appropriate technical and organisational measures in place to protect your personal data; however in some instances we may be compelled by law to disclose your personal data to a third party and have limited control over how it is protected by that party.

We will not:

- Sell or rent your data to third parties
- Share your data with third parties for marketing purposes

9. Security of your personal information

We are committed to doing all that we can to keep your data secure. Only committee members, coaches & session leaders will have access to the information you provide to us. The information that you provide will be stored securely on our electronic systems.

We have set up systems and processes to prevent unauthorised access or disclosure of your data – for example, we protect your data using varying levels of encryption.

We are committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage. When you provide your personal data through our website this information is transmitted across the internet securely using high-grade encryption.

Any payment transactions will be encrypted.

10. Storing your information and deleting it

We shall only retain personal data for as long as is necessary for the legitimate purposes for which the personal data is processed. When those purposes come to an end, we shall securely delete the personal data unless the retention of the personal data is required in order to comply with the law.

When one of the above situations arise, we will review the information which we hold concerning you and determine whether there are any legal reasons why we need to continue holding that information. Once the identified purpose comes to an end, unless there is another identifiable purpose for which it is necessary to hold on to your information, we will delete your information.

If you provide information via a survey for research purposes, the information will be deleted or kept in an anonymised format once the information has been analysed and reported upon.

11. Your rights

In relation to the information which we hold about you, you are entitled to:

- See a copy of the personal data that we hold about you
- Ask us to rectify the information where it is inaccurate or is incomplete. If we agree the information is inaccurate or incomplete and make the rectification, we will inform any recipients of the information of the change, where possible
- Ask us to erase the information
- Ask us to restrict what we do with your information
- Object to our use of your information and ask us to stop that use, in certain circumstances
- Instruct us to provide you with the information we hold about you in a structured and commonly used format or transmit that information directly to another organisation.

If you have any of these requests or questions in relation to your personal data, please contact our Data Protection Officer.

You also have the right to complain to the Information Commissioner's Office (the "ICO") if you are not satisfied with the way we use your information. You can contact the ICO by writing to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by email on casework@ico.org.uk.

12. Reviewing our Privacy Policy

This policy will be kept under review and if amended notification will be made on our website.

13. How to contact us or make a complaint

Please contact the Data Protection Officer (DPO) if you:

- Have any questions about anything in this Privacy Policy
- Think that your personal data has been misused or mishandled

14. Cookies or other tracking technologies

In order to improve our services, to provide you with more relevant content and to analyse how visitors use our website, we may use technologies, such as cookies, pixels or tracking software. Please be aware that in most cases we will not be able to identify you from the information we collect using these technologies.

For example, we use software to monitor customer traffic patterns and website usage to help us develop the design and layout of the website in order to enhance the experience of the visitors to our website. This software does not enable us to collect any personal data. In addition, in order to understand how our customers interact with the emails and the content that we send, we use analytics that allow us to know if the emails we send are opened or if the content of our emails is displayed in text or html form.

We also use cookies in our website. Cookies are small pieces of information stored by your browser on your computer's hard drive. They enable you to navigate on our website and allow us to make improvements to our customers' online experience. You can delete cookies if you wish; while certain cookies are necessary for viewing and navigating on our website, most of the features will be still accessible without cookies.