

# Wildfire Cheer C.I.C.

## Data Protection & Privacy Policy



### **Introduction**

Wildfire Cheer C.I.C. is committed to respecting your privacy and data. This policy is to explain how we may use personal information we collect before, during and after your/your child's membership with us. For the purposes of the policy, a 'member' is someone who attends any of our cheerleading classes. This policy applies to you if you/your child is a member or you are the parent/guardian of a member under the age of 18. This policy explains how we comply with the law on data protection and what your rights are and for the purposes of data protection. The Club Director has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contact Us" section at the end of this document.

### **Personal information we may collect**

We may collect the following personal information about all club members:

- Name
- Date of birth
- Gender
- Home address
- Details of parents/guardians if under the age of 18 (see below)
- Details of next of kin and their contact details (if different from above)
- Details of any medical conditions or injuries which are relevant to participating in cheerleading
- Details of any accidents or injuries sustained during classes or events and any first aid given
- Details of any grievances raised or disciplinary action
- Record of attendance at any classes or events held by the club
- Images in photographic and/or video form (see 'Photography & Image Policy' for more information)

We may collect the following personal information about club members who are over the age of 18 and the parents/guardians of club members who are under the age of 18:

- Personal contact details that allow us to contact you directly such as name, email addresses and telephone numbers
- Records of your interactions with us such as telephone conversations, emails and other correspondence via social media
- 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
- Your marketing preferences so that we know whether and how we should contact you

### **How we collect personal information**

We will collect personal information about members and parents/guardians of members via our registration form before or at their first attendance at a class. The form may either be completed electronically or on paper. We may also collect more basic information such as name and age via email before the member first attends a class.

## How we may use your information

The table below describes the main purposes for which we process your/your child's personal information, the categories of your information involved and our lawful basis for being able to do this.

<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you</b>	All contact and membership details, transaction and payment information, and records of your interactions with us	This is necessary to enable us to properly manage and administer your/your child's membership with us.
<b>To send you information which is relevant to you/your child's membership of the club, including details about competitions and any updates about the club as a whole</b>	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership contract with us.
<b>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about our commercial partners</b>	Contact details and marketing preferences.	Where you have given us your consent to do so.
<b>To answer your queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer memberships and run our club.
<b>For the purposes of promoting the club and our classes and events</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so. Please see our Photography & Image Policy.
<b>To comply with health and safety requirements</b>	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
<b>To arrange for any trip or transportation to and from an event</b>	Details of next of kin, family members and emergency contacts, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.

<b>To use information about your physical or mental health (including any injuries) or disability status to ensure your health and safety</b>	Health and medical information	We have a legitimate interest and a legal obligation to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.
<b>To gather evidence for possible grievance or disciplinary hearings</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary issues.
<b>For the purposes of equal opportunities monitoring</b>	Name, date of birth gender and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.

For some of your/your child's personal information there is a requirement or obligation for you to provide this. If you do not provide us with the requested personal information we may not be able to admit you/your child as a member or we may have to terminate the membership. 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 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.

## **Direct Marketing**

From time to time, we may contact you by email with information about products, services and events 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 emailing us to request this (see "Contact Us").

## **Disclosure of your personal information**

We may share your personal information with the following parties:

- Any party explicitly approved by you
- Competition providers if you/your child is part of our competitive programme
- 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
- The local authority in the case of a safeguarding issue about a child or vulnerable adult

We will never share your personal information with any other third party, unless we have gained your explicit consent to do so. We will never share your personal information outside of the EEA (European Economic Area).

## **Storage and security of your personal information**

We recognise the important of safeguarding your personal data and storing it securely. We will ensure:

- All personal data is kept in a locked premises and in a secure file
- Where it is necessary to take this information outside of the premises, it will never be left unattended
- Personal data will never be left in an unsecure location (such as in a car overnight)
- All personal data stored electronically is password protected
- No persons other than relevant employees will have passwords to access your personal data
- When speaking in a public place, care will be taken not use full names or disclose other personal information which may be overheard

## **How long do we keep your 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 5sto years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding enquiries where you/you child never actually attended the club, where we hold records for a period of not more than 12 months.
- 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. You can contact us by using the details set out in the "Contact us" section below.

## **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
- 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 policy 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 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 "Contact 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. We are here to help and encourage you to contact us to resolve your complaint first.

## **Monitoring**

We may update this privacy policy 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.

## **Contact Us**

In the event of any query or complaint in connection with the information we hold about you, please email the Club Director (Hannah Bottomley) on [hannah@wildfirecheer.com](mailto:hannah@wildfirecheer.com)

Signed: Hannah Bottomley  
Director and Head Coach, Wildfire Cheer C.I.C.

Version dated 23<sup>rd</sup> May 2018