



Club Data Protection Privacy Notice

The GDPR is Europe's new framework for data protection laws. It replaces the previous 1995 data protection directive, which current UK law is based upon. **The new regulation starts on 25 May 2018.**

We take your privacy very seriously. Have a look at what we're doing with your personal information and how we're keeping it secure.

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 Data Protection Privacy Notice.

When we collect, use, share, retain or do anything else with your personal information (known collectively as 'processing') we are regulated under the General Data Protection Regulation (GDPR) and are responsible as 'controller' of your information.

This notice applies to you if you are:

- An existing or prospective member of our club;
- A person with parental responsibility for a member;
- An existing or prospective club volunteer or official; and
- [other e.g. include fans if you allow fans to sign up to marketing communications via your website].

It is important that you read this carefully as it contains key information about how we use your personal data and your associated rights.

About us

Tumbles Academy of Gymnastics is a Limited Company. Our members are gymnasts or the parents (if the gymnast is a child). We provide the opportunity for our members to participate in our activities, which include recreational classes, training, camps, competitions, squads and other similar gymnastics activities.

We register with British Gymnastics who governs the sport, provides insurance for clubs and our members and offers competitions and events. It is a condition of British Gymnastics club registration that all our club members also register as individual members of British Gymnastics.

We also affiliate to North West Gymnastics who runs competitions and events in which we may participate.

Information we collect about you

The categories of personal information we process includes:

- Contact details* (gymnast or parent and emergency contacts)
- Gymnast date of birth*
- Gymnast gender
- Any relevant medical conditions and/or disabilities and additional related information
- Other relevant individual needs for example, information about learning, religious or other support needs.
- Any individual risk assessments (gymnasts and others if applicable)
- Details of any reasonable adjustments or steps taken to support your individual needs
- British Gymnastics membership details* (which are confirmed by British Gymnastics when you join or renew)
- Gymnast attendance and achievement records

- Any communications from, to or relating to you
- Details relating to standards of conduct
- Any accident or incident reports including details of injuries
- Bank details (If you are making regular payments to us or we are making payments to you e.g. for expenses)
- Experience, qualifications, training and confirmation that you have completed a criminal record check.

The information marked with an * above is essential for us to provide your membership. It is your choice whether you provide all the information we have requested but not providing information may affect our ability to meet you or your child's needs and to protect their well-being.

If you are a competitive gymnast, we record other information about you to support your training and participation in competition such as:

- Training and technical information
- Lifestyle information
- Nationality (if you are competing at international level)

If you attend an event or trip with the club, we will also collect the following information where relevant:

- Dietary requirements and any other relevant information that we need to know to ensure your needs are met; and
- Passport information if the trip is abroad.

How personal information is collected?

Tumbles operates a number of IT systems which collect personal information:

- Tumbles uses a software platform called Coacha software for administration purposes. Coacha acts as a data processor for Tumbles.
- Website forms - Any forms which are available on our website are powered by Jotforms also bound by the EU General Data Protection Regulations. When you fill out a form, the data that you submit will be forwarded to Jotforms and will be collated into an email and sent to us. Your data will remain within Jotform's secure database in the EU for as long as we continue to use Jotform's services or until you specifically request removal by emailing us.
- Tumbles utilises a payment gateway provided by GoCardless. The GoCardless system provides a highly secure payment method (ISO27001 certified), processing payments for thousands of on-line businesses, including ours. It is GoCardless utmost priority to ensure that transaction data is handled in a safe and secure way. No card or banking details are stored at any stage of the process on PPA computer systems. All payment transactions are handled by GoCardless secure servers. GoCardless is ISO27001 certified and is routinely audited by an independent third party to ensure compliance with the certification. GoCardless also provides mandatory information security training to all employees.

When you register as a new member or renew your membership online with British Gymnastics (or you register or renew on behalf of a child under the age of 16), Tumbles uses the necessary data you have provided as we need to collect and process information about you. Some of this information is essential for us to provide your membership but it is your choice whether you provide all the information we have requested. Not providing information may affect our ability to provide all the benefits of membership to you.

How we use your information for contractual purposes

- To provide the gymnastics activity you have requested, communicate with you about this activity, changes to our terms and conditions and to process payments.

How we use information about you for legitimate purposes

Legal obligations

We have a duty of care to ensure it is safe for you or your child to take part in gymnastics activity and to keep you/them safe while participating. Some individuals may be at risk of harm from participating in gymnastics activity as a result of a pre-existing condition. It is vital that you let us know if there is any reason why taking part in gymnastic activity may be unsafe prior to participation. With your agreement, we will review any information you provide and undertake risk assessments in consultation with yourself and any appropriate trained professionals e.g. medical consultants. When we ask participants to provide relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

If you are selected for a role at the club, we will usually obtain a reference from any appropriate organisation or individual you have nominated.

When you tell us about any special needs such as disabilities or other support information we may use relevant information to comply with our legal obligations under the Equality Act 2010. We will review any information you have provided to help us identify any actions we can take to support inclusion. We may need to ask you for more information to help us to best meet your or your child's needs. We will keep a record of any steps we take to support inclusion.

If you are wishing to volunteer or work for us, we may need to ask you to complete a criminal record check as we have a legal obligation to do so. We jointly control the checking process with [British Gymnastics] who is responsible for the assessment of any content on the check and will only share information with us where it is appropriate. For example, if you are considered by British Gymnastics to be unsuitable to take on the role, we may share relevant and proportionate information about criminal offences where it is deemed that while you are not considered unsuitable to take on the role, if it is considered necessary for safeguarding purposes.

When we retain information about you, even after you are no longer taking part in gymnastics activity, this is often because we are required to do so by law such as records we are required to keep for business and accounting purposes. Sometimes we are also legally obliged to share information about you with third parties. More information is provided below.

Legitimate interests

We rely on legitimate interests for the following purposes:

- **Responding to communications, concerns or complaints and seeking feedback from you about our services.**
We will use the information you provide to respond to any comments or questions you raise and where appropriate to undertake investigations into any complaints or concerns. On occasion, we may contact you to seek your views on the services we provide.
- **Holding emergency contact information**
When you join the club, we collect contact details. We also ask you to provide an emergency contact which we will only use in exceptional circumstances if we are unable to contact your primary contact e.g. a parent.
- **Maintaining attendance registers, achievement records and waiting lists**
For health and safety purposes and club records, we need to maintain a register of those in attendance at training or other club activities.

If there are no places in the club, we can place you on our waiting list and will contact you using the details you provide to inform you when a place is available.

- **Entering you into a competition and providing results**

If you wish to take part in a club competition, your information (usually your name, date of birth and gender) will be used to enter you into the appropriate category and your score will be recorded. Results of competitions are normally published [on our website].

If you wish to enter a competition organised by another gymnastics body, including British Gymnastics, home country NGB, Regional and County Gymnastics Association. We will provide your information to the organiser to enable you to take part in the competition or event that they are organising.

- **Collecting additional information to support a participant attending a club trip**

Occasionally we organise residential events or trips. If you or your child registers for one of these events, we will need to collect additional information, that may vary dependent on the specific activities and whether they involve meals and travel. Additional information we require may include passport information and any other relevant information necessary to provide support whilst away from home.

- **Monitoring performance and undertaking fitness assessments**

If you or your child are/is a competitive/elite/squad gymnast, we will need to collect additional information about you/them. We track and monitor gymnast's performance in training, trials and competition and undertake regular fitness assessments. We may require additional information about lifestyle and education if you or your child are/is training at an elite level and requires time out of school or lifestyle.

- **To monitor that you have completed any required safeguarding training and criminal record checks**

If you undertake a role where a criminal record check and safeguarding training are required, we will receive confirmation from British Gymnastics if your check is approved and that you have completed the required safeguarding training.

- **Filming for coaching purposes**

On occasion, we may film gymnasts e.g. during a gymnastics session for coaching purposes. Videos taken at training sessions for individual coaching purposes will not be used for any other purpose without prior consent.

- **Photography and filming [at large club events] to promote the club**

We may take photos at club events to promote the club on our website, club social media account and in communications. At our large club events such as our annual club competitions and club display we may film the event to create a DVD. Any images of children will be published in line with our safeguarding policy.

Let us know if you do not wish to be filmed or photographed or do not want your image to be published. While we can usually take steps to prevent you from being photographed or filmed at small club events, please bear in mind that at our large public events, it may be difficult to avoid capturing you in footage. However, we always review all photographs prior to publication and we will ensure any images of you are deleted.

If we are filming or taking photos for any other purpose, we will ask for your consent.

- **Running and monitoring our club website and social media**

We do not use any tracking or analytics on our website. Your IP address will be logged by our webserver, but we would not be able to identify you from this information alone.

We have carried out a legitimate interest assessment (LIA) to ensure that the above processing is necessary and is carried out in a way that ensures a balance between the club's interests and your individual interests,

rights and freedoms with appropriate safeguards, especially to protect the interest of data subjects who are children. We can provide details of these assessments on request.

Consent

We rely on consent in the following circumstances:

- **To use your email or telephone numbers for marketing purposes**
- **To take photographs and video at a small club event or training for publication.**

With your consent, we may also take photos during training or at small club events to promote the club on our website, club social media account and in communications. All film and photos of children will be published in line with our safeguarding policy.

You have a right to object to the use of your information for any purposes we undertake based on legitimate interests. Please complete an objection to processing data form and send it to our Data Protection Officer at info@tumbles-gymnastics.co.uk. Please note that in some cases, this may affect our ability to carry out the things we need to do for you to take part in gymnastics.

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:

- As part of our response to any accident or incident.
- 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.

We may also need to use information about you relating to the above activities to exercise or defend legal claims.

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 or your religion, race or gender identity). 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:

- You have given your explicit consent or have made this information public;
- 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;
- There is a substantial public interest in doing so; or

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

Why we share information about you

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

We may also be required to share your personal information in the following reasons:

- Complying with legal and/or regulatory responsibilities
We may be required to share information with bodies such as Her Majesty's Revenue & Customs (HMRC), Health & Safety Executive (HSE), Police and Information Commissioner's Office (ICO). We may also share information with other organisations to safeguard children. Any information that is shared

will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

- Insurance
- Obtaining legal or professional advice
- Obtaining a service from a third party

All service providers are contractually required to ensure your information is secure and cannot use this information for their own purposes. Where we are required to share information with them to provide the service, we only disclose information that is strictly necessary to deliver the service.

Except for the above, will only share your information with any other third parties with your prior agreement.

Transfers of data out of the EEA

We will not transfer or store your personal data outside the UK or the European Economic Area (EEA).

How long will data be stored for?

In accordance with the GDPR, we do not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

Booking information including participant's name, class information and any accidents are kept until the participant is 21 years old, this is to comply with Health & Safety regulations.

Your rights

The right to be informed

Your privacy is extremely important to Tumbles Academy of Gymnastics Club and we are fully committed to providing you with clear and transparent information about how we use your personal information in this privacy notice as we value the trust you give us when sharing your personal information.

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**
You have the right to access the personal information we hold about you. You can also request a copy of any other information we hold by writing to us using the contact details below.
- **To have your data rectified if it is inaccurate**
If you think that any of the information we hold is inaccurate, you can ask that corrections are made. 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)**
If you do not renew your membership or cease to have a relationship with the club, we will delete any information you provided within two years except for any financial/accounting records which need to be retained for six years in line with UK tax law. Additional information that has been provided solely for the purpose of participating in a specific activity will be deleted after the event

Video footage that has only been taken for coaching purposes will be retained only for as long as it is required for that purpose and in most cases, will be deleted within one month.

Photographs and other video footage captured for promotional purposes will be retained for up to 4 years. After this time, they will be deleted 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 the retention period has lapsed.

CCTV footage will be deleted within [one month] unless it is required to prevent or detect a crime.

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.

- **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**
If you wish to move to another club, you can transfer your information to another club registration by logging into 'My Account' on the British Gymnastics system. Alternatively, if you wish to leave the club, the information you provided on behalf of our 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 transfer your information to another club. This may be limited to your club membership
- **To object to:**
 - **Any processing based on legitimate interests**
The right to object is specific to the data subject's particular situation. 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.
 - **Your personal information being used for direct marketing activities**
You can object to our direct marketing activities by unsubscribing from the relevant communication as described above in the marketing section of this notice.

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

To exercise any of your rights or if you have any questions about our privacy notice please contact our Data Protection Officer Gemma Scott at: info@tumbles-gymnastics.co.uk.

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 the privacy policy

We keep our privacy notices under regular review. This privacy notice was last updated in October 2020. We may change this privacy notice from time to time and updates will appear on this page when necessary.