# MOMENTUM GYMNASTICS CLUB

## Data Protection Policy

**MOMENTUM GYMNASTICS is committed to processing personal data lawfully, fairly and transparently. This policy explains how we handle information about our members, families, coaches, officials and volunteers, in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.**

### What data we hold

We hold personal data needed to run the club safely, including contact details, dates of birth, emergency contacts, medical information, membership and payment records, and, where relevant, information relating to safeguarding, incidents or accidents. Medical and safeguarding information is "special category" data and is given extra protection.

### Why we hold it (lawful basis)

- To perform our contract with members and parents/carers, for example to run sessions and take payment.
- To comply with our legal obligations, for example safeguarding, health and safety, and British Gymnastics membership requirements.
- Where it is in our legitimate interests, for example keeping registers and running the club safely, and this does not override members' rights.
- With explicit consent, for example photography and filming, which can be withdrawn at any time.

### The data protection principles

Personal data is:

1. Processed lawfully, fairly and in a transparent manner.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and kept up to date.
5. Kept for no longer than is necessary.
6. Processed securely, with appropriate technical and organisational measures.
7. Processed in line with individuals' rights under UK GDPR.

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**Children's data**

We take particular care with information about children. We collect only what we need to run sessions safely, share it with coaches and volunteers on a need-to-know basis, and do not use it for any other purpose without the consent of a parent or carer.

**How long we keep data**

We keep membership and payment records for 3 years after membership ends, and safeguarding records for 3 years in order to meet our legal and insurance obligations. Data no longer needed is securely deleted or destroyed.

**Sharing data**

We share data with British Gymnastics as required for membership, insurance, competitions and safeguarding, and with the emergency services where necessary. We do not sell or share data with third parties for marketing purposes. We do not transfer data outside the UK without appropriate safeguards.

**Your rights**

You have the right to be informed how your data is used, to access the data we hold about you, to have inaccurate data corrected, to ask for data to be deleted or restricted in certain circumstances, and to object to certain processing. To exercise any of these rights, contact Annie admin@momentumgymnastics.co.uk

**Keeping data secure**

- Paper records are kept in a locked location, accessible only to those who need them.
- Electronic records are password protected and access is limited to those who need it.
- Personal devices used to hold club data are secured and data is removed when no longer needed.

**Data breaches**

Any suspected loss, theft or unauthorised disclosure of personal data must be reported immediately to Annie, who will assess whether the Information Commissioner's Office (ICO) and affected individuals need to be informed, and act promptly in line with ICO guidance.

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**Data Protection Lead**

MOMENTUM GYMNASTICS' Data Protection Lead is Annie, contactable at admin@momentumgymnastics.co.uk

Any questions, concerns or complaints about how we handle personal data should be directed to them in the first instance. You also have the right to complain to the ICO (ico.org.uk).

**Review**

This policy is reviewed at least once a year, and sooner if the law or our practices change.

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