

Nicetri Club Privacy Policy and General Data Protection Policy (GDPR)

Rev 2 (Last updated: 14 December 2021)

We are committed to protecting your personal information and being transparent about what we do with it, however you interact with us. We are therefore committed to using your personal information in accordance with our responsibilities. As part of this, we are required to provide you with the information in this Privacy Notice under applicable law which includes:

- the Data Protection Act 1998, which will be replaced by the General Data Protection Regulation (EU) 2016/679 from 25 May 2018
- the Privacy and Electronic Communications (EC Directive) Regulations 2003.

We won't do anything with your information you wouldn't reasonably expect, and this policy explains how and what we do with your data and why we use and store it.

In this policy when we refer to Nicetri Club, St Neots Triathlon Club, or Nicetri, or to 'we' or 'us' we are referring to Nicetri Club, which are non-profit making sports club.

In this Privacy Policy we include:

- 1. How we collect information about you
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If you have any queries about our Privacy Notice, please contact us by the contact page on our website <a href="Contact Us">Contact Us</a> | NiceTri Club St Neots (nicetri-club.co.uk) <a href="Micetriclub@gmail.com">Nicetriclub@gmail.com</a>



#### How and when we collect information about you

We may collect and store information about you whenever you interact with us. Examples of this include:

- When you sign up for Nicetri club membership
- When you buy items from our online shop
- When you contact us with a query
- When you offer to volunteer for us
- When you offer to write content for our website
- When you send us a direct message on a social media platform (e.g. Facebook, Twitter, Instagram)
- When you post or comment on a post on one of our social media groups or pages.
- If you apply for a committee role
- When you sign in to attend a club Covid-secure session

#### What personal information we collect

The types of personal information we collect will be based on the way in which you interact with Nicetri Club. The majority of this information will be personal information, including your name, email address, postal address, telephone number, age and gender. The nature of the personal information collected will be based on how you interact with us, which is detailed in the following section. In all cases we only collect information that we need.

Some of the information collected may be data that is deemed 'sensitive' or 'special category' data. In the case of Nicetri Club this sensitive data will be in the form of health data, specifically any medical conditions. Sensitive data will only be collected where necessary and where such data is needed to for safety reasons, for example, we need to know any medical conditions you have so that advice to health professionals can be offered if required.

# Why we collect your personal information and how it is stored

In almost all cases we will only ever contact you following initial contact by you or following provision of personal information by you. We use and store your personal information in the following ways:



- We collect your email address when you sign up to our membership
  and then use that email address to send you updates. Your email
  address is stored in a mailing list using the online program. You can
  unsubscribe from our mailing list by contacting us on Contact Us |
  NiceTri Club St Neots (nicetri-club.co.uk) Nicetriclub@gmail.com
- We sometimes take photographs at our club activities. Photos are taken at such activities on the basis of legitimate interest and will only be in the context of: 1) Online photo galleries; 2) Nicetri Club newsletters; 3) Nicetri Club website; 4) Nicetri Club social media (Facebook, Twitter and Instagram). If you do not want photos of yourself used in this way please contact us on <a href="mailto:Contact Us">Contact Us</a> | NiceTri Club St Neots (nicetriclub.co.uk) Nicetriclub@gmail.com</a> prior to or following the activity or by letting the photographer know you do not want to be photographed at the event/ activity.
- When you buy any items from our online shop we need to collect your personal details (name, email address, postal address, telephone number) and credit/debit card information, to take payment for your goods and to deliver the goods to you. These personal details are held within our website on the eCommerce platform, WooCommerce and transactions are processed using Webmail/Paypal. Nicetri Club never have access to your credit/debit card details when payment is taken in this way. Financial transaction data, excluding credit/debit card details, is held for as long as the law requires us to for tax or accounting purposes, which may be up to seven years from the transaction date.
- When you offer to volunteer with us we need your personal information (name, email address, telephone number) to contact you with regards to your offer of help. We may also need additional personal and sensitive personal data, such as any medical conditions you have, to assign you an appropriate volunteering role and to make sure we can support you effectively in your volunteering role.
- When you contact us with a query of any kind by email, website or social media we use the information you have provided to respond to your initial message. We then periodically delete any emails considered to be solved and we not hold any information (emails or email



addresses) we deem to be no longer needed. Reviews are undertaken at a minimum interval of every two years.

- When you send us a direct message on a social media platform (e.g. Facebook, Twitter or Instagram) we use any personal information provided to respond to your message. We may also, on occasion, contact you first via direct message on a social media platform for such means as notifying you that you have won a competition, to ask whether we can use a photo you have uploaded to the page or group, or because we are interested in a story you have posted. By posting, you are agreeing to such information being displayed on Club Social Media
- You may interact with us via a page, group or account on a social media platform (e.g. Facebook, Twitter or Instagram). In these cases, your interaction with us is stored on that page, group or account on which it was posted. Such interactions may include personal information such as your name. If you would like any such interactions to be removed please either delete the interaction yourself, send us a message on the platform in question, or <a href="mailto:contact Us">Contact Us</a> | NiceTri Club St</a>
  <a href="mailto:Neots(nicetri-club.co.uk">Neots(nicetri-club.co.uk</a>) <a href="mailto:Nicetriclub@gmail.com">Nicetriclub@gmail.com</a></a> The personal information stored will be determined by your privacy settings on the social media platform in question.
- You may provide content for our website, which may include personal information such as your name and email address. When finalising website content you have provided, we will ask how long you are happy for the feature to be on the website, and we will delete the feature in line with this agreement. If you would like your personal details removed from our website please request this by contacting us on <a href="Contact Us">Contact Us</a> | NiceTri Club St Neots (nicetri-club.co.uk)</a>
   Nicetriclub@gmail.com
- We may use your personal information to record and deal with a complaint, to record a request not to receive further information and for other essential, internal record keeping purposes. Following completion



of any such tasks, where relevant and on request, your personal details will be removed from the records.

- When you use our website anonymous user details will be collected to enable development of the website and for usage tracking, which is undertaken by Google Analytics. Further details of this type of data collection can be found in our Cookies section (Section 13).
- We may use your personal information to prevent crime and to keep our team and the public safe.
- We may use your personal information where we reasonably think that there is a risk of serious harm or abuse to you or someone else.
- We may be required to process your personal information to fulfil a legal, regulatory or tax obligation.

# How long we store your information

We will keep your personal information collected for financial transactions, excluding your credit/debit card details, for as long as the law requires us to for tax or accounting purposes (which may be up to seven years after a particular transaction).

When you unsubscribe from our newsletter your personal information will automatically be deleted through our mailing list database software, Webmail. If you wish to rejoin the mailing list at any point you will need to do this via <a href="Contact Us">Contact Us</a> | NiceTri Club St Neots (nicetri-club.co.uk) <a href="Nicetriclub@gmail.com">Nicetriclub@gmail.com</a>

In respect of any other personal information, we will retain it for no longer than necessary for the purposes for which it was collected, taking into account guidance issued by the Information Commissioner's Office.



# When we share your personal information

We will always only use your information for the purposes for which it was obtained. We will not, under any circumstances, sell or share your personal information with any third party for their own purposes, and you will not receive marketing from any other companies, charities or other organisations as a result of giving your details to us unless you explicitly consent to receive communication from them.

We may need to share your information with data hosting providers or service providers, such as our website developer, who help us to deliver our services. These providers will only act under our instruction and are subject to pre-contract scrutiny and contractual obligations containing strict data protection clauses.

We will also comply with requests where disclosure is required by law, for example, we may disclose your personal information to the government for tax investigation purposes, or to law enforcement agencies for the prevention and detection of crime. We may also share your information with the emergency services if we reasonably think there is a risk of serious harm or abuse to you or someone else.

# Collecting your consent

On our website and when we collect any personal information, you will always be given the option to opt-in to receive communications from us. By providing personal information to us you consent to its use as described in this Privacy Policy.

If you change your mind in regards to whether you receive such communications please Contact Us | NiceTri Club St Neots (nicetri-club.co.uk) email: Nicetriclub@gmail.com or write to us at 1 Pippin Close, Offord D'Arcy, Cambs PE19 5RF

# Protecting your personal information

We use standard organisational safeguards to ensure that your personal information is secure. We limit access to information on a strictly need-to-know basis and have and will continue to ensure that our team are aware that such information is only used in accordance with this Privacy Policy.

We undertake annual reviews of those who have access to information that we hold to ensure that your information is only accessible by appropriately trained staff and contractors.



If you use your credit or debit card to buy something or make a booking online, please note that we never have direct access to your payment information.

Whilst we take all possible precautions to ensure your personal data is safe, there are always inherent risks in sending information by public networks or using public computers and we cannot 100% guarantee the security of data (including personal information) disclosed or transmitted over public networks.

## Your rights to your personal information

Data protection legislation gives you the right to request access to personal information about you which is processed and stored by Nicetri Club, and to have any inaccuracies corrected. You also have the right to ask us to delete your personal information or to object to our processing of your personal information. If you wish to exercise these rights, please contact us on Contact Us | NiceTri Club St Neots (nicetri-club.co.uk) Nicetriclub@gmail.com

When asking for such a procedure, you will need to provide copies of two separate identification documents, such as a passport, driving licence, or utility bill, and any additional information that is relevant to the nature of your contact with us. This information will help us to locate your records. Please send these documents via post to 1 Pippin Close, Offord D'Arcy, Cambs PE19 5RF or email them to <a href="Micetriclub@gmail.com">Nicetriclub@gmail.com</a>

We will respond within 28 days, on receipt of your written request and copies of your identification documents. We reserve the right to charge a fee to process the request.

## How we use Legitimate Interest

If we want to contact you this will be on the basis of legitimate interest, Legitimate interest is the use of personal data by a data controller (in this case, us) that are deemed necessary (e.g. to provide the product or service) or reasonably to be expected by you. Some of the examples of why we would contact you on the basis of legitimate interest are:

- To confirm that you are on our mailing list
- To notify you that you have been removed from our mailing list
- For upgrades of our terms and conditions, this policy policy or any other agreements that we have between you and us.

Club Activity photography is also undertaken on the grounds of legitimate interest. If you do not want to be photographed or for photos of yourself to be publicised (the ways in which we

**Field Code Changed** 



use photos is outlined in 'Why we collect your data' section) please contact us on <u>Contact Us | NiceTri Club St Neots (nicetri-club.co.uk)</u> prior to or after the event, or identify yourself to the photographer activity lead at the activity.

#### Our policy for Under 16s

To register for our club or one of our activities you need to be over 18 years old.

#### External websites and social media platforms

Our websites contains hyperlinks to lots of other websites, including other local sports clubs and venues. This Privacy Policy only applies to our <u>website</u>, so when you follow a link to other websites from ours you should read their own privacy policies.

This privacy policy only covers our privacy practices and how we will use any information collected from our website, mailing list and social media pages. It does not cover how providers of social media platforms will use your information. You should read the social media site's privacy policies before adding any content to our social media pages, and use the social media site privacy settings and reporting mechanisms to control the way that your information is handled on that site.

# Security

We have strict security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control. Whilst we can't ensure or guarantee that loss, misuse or alteration of information won't occur, we will always use best endeavours to prevent this.

The transmission of information across the internet is never completely secure, and whilst we will always do our best to protect the security of your information, we cannot ensure or guarantee that loss, misuse or alteration of information won't occur whilst you or we are transferring this information.

Where you or we have provided a password enabling you to access parts of our websites or use our services, it is your responsibility to keep this password confidential. Please choose a secure password and do not share it with anyone else.



#### Cookies

A cookie is a small piece of information sent by a web server to a web browser, which enables the server to collect information from the browser. Find out more about the use of cookies <u>here</u>. Our website uses cookies to help provide you with the best experience we can.

We may use cookies to identify you when you visit this web site and to keep track of your browsing patterns and build up a demographic profile. Our use of cookies also allows registered users to be presented with a personalised version of the site, carry out transactions and have access to information about their account.

If the settings on your browser that you are using to view this website are adjusted to accept cookies we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

Our site, like most websites, includes functionality provided by third parties. On our site we sometimes include content from YouTube or Vimeo, which use cookies. Disabling these cookies is likely to break the functions offered by these third parties.

You can switch cookies off by adjusting your browser settings to stop it from accepting cookies. Doing this is likely to limit the functionality of ours and a large proportion of the world's websites as cookies are a standard part of most modern websites.

#### How to make a complaint or raise a concern

If you would like more information, have any questions about this privacy policy, want to make a formal complaint about our approach to data protection, or raise privacy concerns please contact us contacting us on <a href="Contact Us | NiceTri Club St Neots (nicetriclub.co.uk">Contact Us | NiceTri Club St Neots (nicetriclub.co.uk</a>) <a href="Micetriclub@gmail.com">Nicetriclub@gmail.com</a> or by post at 1 Pippin Close, Offord D'Arcy, Cambs PE19 5RF

If you would like to make a complaint in relation to how we have handled your personal information, please follow our complaints procedure. If you are not happy with the response you receive, then you can raise your concern with the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF or you can visit their website.



# **Changes to our Privacy Policy**

Our Privacy Policy may change from time to time, so please check this page occasionally to see if we have undertaken any updates and that you are happy with them.