



# Avon Ski Club Privacy Policy

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## Summary of how we and the SSE use your data

- Avon Ski Club uses your personal data to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes.
- Some data is shared with SSE, who use your data to report to Sport England, voting rights for AGM and to help develop and manage Snowsports.
- Where we or the SSE rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time.
- Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent) have given consent, so that we can ensure we are aware of your condition and that you are supported appropriately.
- Where you work in a particular role within the sport, you may be required to undergo a Disclosure & Barring Service check using the SSE DBS system. The result of this check will be input into your profile on the SSE data management system.

## What does this policy cover?

This policy describes how Avon Ski Club (also referred to as “the Club”, “we” or “us”) will make use of the data we handle in relation to our members, including our use of Snowsport England club management system provided by Snowsport England (“SSE”). The policy also describes SSE’s use of data on the SSE club management system.

It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

## What information do we collect?

We collect and process personal data from you or your parent when you join and when we carry out annual renewals of your membership. This includes:

- your name
- your gender,
- your date of birth,
- your SSE ID (as assigned in SSE management system)
- your home address, email address and phone number;
- your passport and NI details, where we have to check your eligibility or ability to work for us;
- your type of membership, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.;
- your marketing preferences, including any consents you have given us;
- your medical conditions or disability, where you provide this to us with your consent (or your parent’s consent) to ensure we are aware of any support we may need to provide to you.

## **How do we collect your data?**

We collect your data on paper forms. These forms are scanned and stored securely. Once no longer required the original paper forms are shredded. In order to provide information to SSE your details are also held in an encrypted, password protected spreadsheet, and your email address is used in the Club members emailing list.

Committee members will have secure access to emergency contact details for racers during training sessions and Club supported races in case of accidents etc.

## **What information do we receive from third parties?**

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your existing registrations with other clubs. Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and SSE on the status of any DBS check you have been required to take.

## **How do we use this information, and what is the legal basis for this use?**

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for your membership and any merchandise or enter a competition. This includes:
  - taking payments;
  - communicating with you;
  - providing and arranging the delivery or other provision of products, prizes or services;
- As required by the Club to conduct our business and pursue our legitimate interests, in particular:
  - we will use your information to manage and administer your membership and your involvement with its teams and club, and to keep in contact with you for these purposes; After you cease to be member of the Club we will retain you details for a period no longer than 6 years after which your details will be deleted.
  - we will also use data to maintain records of our performances and history.
  - we use camcorders or cameras for video-analysis as part of coached sessions and races.
  - we may choose to send you promotional materials and offers by post or by phone, or by email where we want to send you offers relating to similar products and services that you have already bought or where you have requested such material.
  - we use data of some individuals to invite them to take part in market research;
- Where you give us consent:
  - we will send you direct marketing or promotional material by email; Note that we currently only send emails to fully paid up members, and these directly relate to Club activities. The only exception to this is membership renewal reminders which will be sent out for no longer than one month after the end of the membership year. Should

this model change we will explicitly ask for your consent before sending any direct marketing materials.

- we may handle medical or disability information you or your parent provides to us, to ensure we support you appropriately;
- on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
  - we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
  - we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  - where you hold a role at the Club requiring us to check your right to work, we may process information to meet our statutory duties;
  - we may respond to requests by government or law enforcement authorities conducting an investigation.

### **How does the SSE use any of my information?**

SSE provides Club Management system, but make its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your SSE ID (as assigned by SSE club management system);
- your home address, email address and phone number; and
- your type of membership, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

SSE uses this information as follows:

- As required by SSE to conduct its business and pursue its legitimate interests, in particular:
  - communicating with you or about you were necessary to administer Snowsports in England, including responding to any questions you send to the SSE about Club management system;
  - administering and ensuring the eligibility of competitors, officials and others involved in English Snowsports – this may involve the receipt of limited amounts of sensitive data in relation to disabled competitors, or in relation to anti-doping matters;
  - maintaining records of the sport in England, in particular maintaining details of discipline and misconduct;
  - monitoring use of Club management system, and using this to help it monitor, improve and protect its content and services and investigate any complaints received from you or from others about the club management system;
  - maintaining statistics and conducting analysis on the make-up of Snowsports participants;
  - ensuring compliance with the current SSE Rules and Regulations including those on the affiliation of clubs and Regions;

- communicating with you to ask for your opinion on SSE initiatives.
- For purposes which are required by law:
  - SSE will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent.
  - SSE may respond to requests by government or law enforcement authorities conducting an investigation.

### **Withdrawing consent or otherwise objecting to direct marketing**

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “**How do I get in touch with you or the SSE?**” section.

### **Who will we share this data with, where and when?**

In addition to sharing data with SSE, we will share your data with the third parties below, but no further.

Some limited information may be shared with other stakeholders in Snowsports, such as other clubs, slope management, Constituent Bodies and Regional Associations, so that they can maintain appropriate records and assist us in organising matches competitions and administering the sport.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the SSE's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the SSE as the provider of Club management system and internet service provider for website hosting. Note that the personal details published on the Club website are restricted as far as required to publish the results of races and competitions.

The Club has no activities outside of the EEA and will not transfer any information outside of the EEA. Should this situation change in the future this policy will be updated accordingly.

### **What rights do I have?**

You have the right to **ask us for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the SSE for its own purposes on the club management system.

To exercise any of these rights, you can get in touch with us– or, as appropriate, SSE or its data protection officer – using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by SSE Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional.

### **How do I get in touch with you or SSE?**

We hope that we can satisfy any queries you may have about the way we process your data. If you have any concerns about how we process your data, [or would like to opt out of direct marketing], you can get in touch at [enquiries@avonskiclub.co.uk](mailto:enquiries@avonskiclub.co.uk) or by writing to Avon Ski Club Secretary via SSE address below.

If you have any concerns about how the SSE processes your data, you can get in touch at [info@snowsportengland.org.uk](mailto:info@snowsportengland.org.uk) or by writing to The Data Protection Officer, Sportpark, 3 Oakwood Drive, Loughborough, LE113QF.

### **How long will you retain my data?**

We process the majority of your data for as long as you are an active member and for as long as we are required to by HMRC or WESSPORT (usually 6 years) after this.

Where we process personal data for marketing purposes or with your consent, we process the data for the period of your membership unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract or for a competition, we keep the data for 6 years from your last interaction with us.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The SSE will maintain records of individuals who have registered on the Club Management System, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the SSE's privacy notice to be set out on [www.Snowsportengland.org.uk](http://www.Snowsportengland.org.uk)

Records of your involvement in a particular competition, on results pages or in competition reports may be held indefinitely both by us and SSE in order to maintain a record of the sport.