

Invictus Gymnastics Club

Aldermaston Recreational Society

Tadley, Reading, RG7 4PR

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Email: invictusgymnasticsclub@yahoo.com

Privacy Policy

Invictus Gymnastics understands that your privacy and personal information is important. We treat your personal information you provide us with about yourself and your child with strict confidentiality. Your information will be used and recorded with the General Data Protection Regulation, as well as the Data Protection Act, 1998.

We promise to look after all personal information, and we will not sell on any of your information about you to any other party.

Please also refer to our Cookie Policy which forms part of this Privacy Policy.

This Privacy Policy covers the following:

1. Personal Information we collect about you
2. How we use your personal information that you give us
 - Legal Reasons
 - Legitimate Interest
 - Consent
 - Special Categories of personal data
1. Disclosure of your personal information
2. How we store your information, and keep it secure
3. Our website
4. Access to your information and correction of your personal information
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1. Personal Information Invictus Gymnastics collects about you.

Invictus Gymnastics will only collect information about you if you willingly supply us with it. We collect information about you and your child when you fill out our online contact forms and application forms. This information will include:

- Contact details (members details and parent's details for emergency contacts)
- Date of birth of participant
- Any relevant medical conditions and/or disabilities and additional related information
- Participants doctor's details in relation to the point above

Our application form will also ask if you give us consent to take and publish photos of your child on our highly monitored and private social media pages, as well as our website.

- Participant's attendance and achievement records.
- Any communications from, to, or relating to you.
- Details relating to standards of conduct
- Membership details

It is your choice whether you provide all of 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.

2. How we use your personal information that you give us

We use the information we hold about you for a variety of purposes. Data Protection law requires Invictus Gymnastics to tell you what our legal reason is for each purpose.

Contractual Purposes

When you ask us to provide you a service, such as membership and registration for our gymnastics classes, we usually need to use the information about you to fulfil our service to you, for example:

- To contact you to confirm arrangements;
- To notify you about changes to our terms and conditions;
- To tell you when your membership is up for renewal
- To provide you with the benefits and services to which you have subscribed

Legal Obligations

Invictus Gymnastics 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 our activities may be unsafe prior to participation.

With your agreement, we will review any information you provide us and undertake risk assessments in consultation with yourself and any appropriate professionals e.g. medical consultants. When we ask participants for their

relevant health information such as details of medical conditions, medication needs, allergies or injuries, this is because we have a legal obligation.

When you tell us about any special needs such as disabilities or other support 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 of Invictus Gymnastics activities and classes. We may need to ask you for even more information to help us to best meet your child's needs. We will also keep a record of any steps we are taking to support inclusion.

Legitimate Interests

Invictus Gymnastics rely on legitimate interests for the following reasons:

- To respond to your communications, concerns or complaints and may seek feedback – We will use the information you have provided us with to respond to any comments or questions you have brought to our attention, and where appropriate to undertake investigations into any complaints or concerns. We may sometimes reach out to you to ask you for feedback on our activities, services and classes.
- Holding emergency contact information – We you apply for membership, we collect contact details. We will also ask you to provide an emergency contact which we will only use in exceptional circumstances if we are unable to contact the child's 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 for classes. We maintain a record of achievements; gymnast's names are recorded against their relevant level.

If there are no spaces available in Invictus Gymnastics, we can place you on our waiting list and we will contact you by using the details you have provided us with you inform you when a space comes up.

- Entering you into a competition and providing you with the results – If you wish to take part in a competition, your personal information will be used to enter you into the appropriate category and your score will be recorded. Results of our competitions are normally published on our website and our social media platforms.

If you would like to enter a competition organised by another gymnastics body, including British Gymnastics, we will provide your information to the organiser to enable to you take part in the competition.

- Monitoring performance and undertaking fitness assessments – if you or your child are/is a competitive 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 will carry out regular fitness assessments.
- Our coaches have required safeguarding training and criminal record checks
- Filming for coaching purposes – on occasion, we may film participants e.g. during a class for coaching purposes. Videos taken at training sessions for individual coaching purposes will not be used for any other purpose without prior consent of the appropriate person.
- Photography and filming in Invictus Gymnastics – We publish images on our website, social media platforms and our printed communications. We ask for parental consent when filling out the application form, and any images of children will be published in line with British Gymnastics and other safeguarding policies.
- If you do not wish to be filmed or photographed, or do not want your photograph published, please let us know.
- We do not use any tracking or analytics on our website – although, your IP address will be logged by our webserver, but we will not be able to identify you from this information alone – it is strictly just statistical information.

Consent

Invictus Gymnastics' relies on your consent in the following circumstances:

- To take photographs and videos at events, training sessions for the use on publications, website and social media.

When you have given us your consent for your personal information to be used for a particular purpose, you have the right to withdraw this consent at any time, which you may do so by contacting us on the contact details below. If you provided any consent for a specific purpose as part of the information you provided to British Gymnastics, your consent can be withdrawn at any time by logging into your British Gymnastics account. Your withdrawal of consent will not affect any use of the data that was made before you withdrew your consent.

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, for example, health and medical data or any information you provide us about a disability, religion, race or gender. It is unlawful for us and any other organisation to process this type of information unless an additional legal condition applies. Invictus Gymnastics 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
- 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.

3. Disclosure of your personal information

On applying for Invictus Gymnastics, you will be asked to register with British Gymnastics. They ensure the sport is safe and well – governed and where relevant to access support and advice. Parents will be in direct contact with British Gymnastics.

We may also be required to share your personal information to comply with legal and regulatory responsibilities. Please check British Gymnastics' Privacy Policy to find out what third parties they may share your personal information with.

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

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

4. How we store your information, and keep it secure

Invictus Gymnastics complies with the standard procedures and requirements as laid down by applicable law to ensure that your personal information is kept secure. On our website, we use the latest in Secure Server Technology (SSL and HTTPS Encryptions) to ensure that all of your personal information coming through our website is protected to the highest standards.

Invictus Gymnastics will store your data in a digital format, and also in paper format. Any information stored through our secure email system will be deleted after three years.

Our physical records are kept on site, in locked filing cabinet, in a locked room. Only Invictus Gymnastics Data Controller has access to them. Membership details are kept on file for 5 years and summer camp application forms are stored for 3 years. After the expiration date on these documents, Invictus Gymnastics takes appropriate measures and processes to destroy the documents.

If you require more information about how your personal data is stored, please contact our Data Controller at Invictus Gymnastics, 292 Abbey Road, Basingstoke, RG24 9EQ. Once we have received your information, we use strict procedures and security features to prevent unauthorised access.

5. Our Website

Our website contains links to our social media accounts. If you follow a link to any other website, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal information to the linked websites.

We have a link to our Facebook page on our website. For Facebook's Privacy Policy, please see: https://www.facebook.com/full_data_use_policy

6. Access to your information and correction of your personal information

Under the data protection law, you have important rights. These include:

- To be informed about how your personal information is processed (please see above)
- To access any personal data Invictus Gymnastics holds about you – You can access your British Gymnastics account to view the information they also hold about you.
- To have your data rectified if it is inaccurate
- To have any of your data deleted – this includes photos, videos and forms etc.
- To portability – you have the right to transfer all of your information to another club]
- To object to:
 - Any processing based on legitimate interests
 - Your personal information being used for direct marketing activities

To exercise any of your rights or if you have any questions about our privacy notice, please contact our Data Controller.

7. Changes to our Privacy Policy

We keep our privacy notices under regular review. This privacy notice was written and published in Nov 2019. We may change our privacy policy from time-to-time. We will post updated versions on our website and in the club premises.

8. How to Contact Us

To exercise any of your rights, or if you have any questions about our privacy notice, please contact:

Miss Kelly Stacey, kellystacey11@yahoo.com, **07799036736**.

While we hope to enable to resolve any concerns you have about the way we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe that your data has been mistreated and does not comply with the General Data Protection Regulation or if you have any wider concerns about our compliance with the data protection law. You can contact the ICO helpline on **0303 123 1113**, or via their website: <https://ico.org.uk/>

**This policy was adopted by:
on:
Date to be reviewed:**

**Invictus Gymnastics Club
01.12.19
01.12.20**