# Hinckley Gymnastics Club (iflip.org) Privacy Policy

## At Hinckley Gymnastics Club, we're committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal information about people who visit our website, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you're agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to tony.ford@iflip.org Alternatively, you can telephone 07920 440725.

#### Who are we?

We're Hinckley Gymnastics Club, the East Midland Region's largest club dedicated to educating people in the sport of gymnastics. Hinckley Gymnastics Club is governed by Trustees and managed by a management team. The primary location is Clarendon Park, c/o HGC Manager, Danesfield Cottages, Bruntingthorpe, Leicestershire LE17 5QF. We also work with additional sites across the East Midlands Region

At Hinckley Gymnastics Club, we take your privacy seriously and will ensure your personal information is kept secure. We provide gymnastics activities and are registered with English Gymnastics and British Gymnastics who govern the sport and offer competitions and events in which we may participate.

## How do we collect information from you?

We obtain information about you when you use, the British Gymnastics CRM (database) system or the PaySubs-Online system for example, when you contact us about classes, payment details, or membership details sensitive data may be collected by either of the systems. For employees, we may also contact HMRC and payroll services,

## What type of information is collected from you?

The personal information we collect might include your name, address, email address, IP address, and information regarding what pages are accessed and when. If you make a donation online or purchase a product from us, your card information is not held by us, it is collected by our third-party payment processors, who specialise in the secure online capture and processing of credit/debit card transactions, as explained below.

## How we use information about you

We need to process information about you or your child for the following reasons:

#### Contractual purposes

To provide the gymnastics activity, product or services you have requested, communicate with you about this activity, to notify you of changes to our services or terms and conditions and to process payments (if relevant).

#### • Legitimate interests

To meet the legitimate aims of the club and ensure your child is well supported and safe whilst participating in gymnastics. This includes:

#### Carrying out any relevant risk assessments:

Some individuals may present with a medical condition that may be a risk of harmed from participating in gymnastics. It is vital that you share any relevant medical information. We will ask for your agreement to undertake any appropriate assessments.

#### Identifying any reasonable adjustments and adaptations to support inclusion:

If you or your child has a disability or any special needs, we will review the 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 in this process.

Responding to any comments, questions or complaints you may send us or to seek your views on the services we provide.

#### Maintaining class attendance records and contact details for emergency purposes.

Filming and taking photos for coaching purposes and/or to promote the club on our website, club social media account and in communications. All film and photos of children will only be published in line with our safeguarding policy.

#### [Monitoring our website and services

We monitor use of our websites and online services, and may use your information to help us monitor, improve and protect our products, contents and services both online and offline.

#### **Preventing fraud**

if you provide a credit or debit card, we may also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud].

You have the right to object to any of the above uses of your information by contacting us. 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.

#### Legal reasons

To comply with applicable laws and protect legitimate club interests and legal rights. This includes, but is not limited to the use of your information relating to legal claims and compliance and regulatory activity.

#### Consent

You have a choice about whether or not you wish to receive information from us. If you want to receive marketing communications from us, then you can select your choices by ticking the relevant boxes situated on the paper or electronic forms where we collect your information.

If you have made a donation to the club, with your agreement, we will use your details to claim gift aid.

## Who has access to your information?

We will not sell, share or rent your information to third parties except with your consent or in exceptional/emergency circumstances where we believe that the sharing of information about you is vital to protect you, your child or another person.

If you/your child want(s) to enter a competition provided by an external organisation, we will, with your agreement, share the information required to enter the event, usually name, DOB and gender. Most competitions are large events and there are likely to be photographers and people filming.

We will not share, loan or give access to your information with third parties for marketing purposes.

Third Party Service Providers working on our behalf: We may pass your information to our third-party service providers, agents subcontractors and other associated organisations for the purposes of completing tasks and providing services to you on our behalf (for example to process payments and send you mailings). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties beyond the Hinckley Gymnastics Club businesses for them to use for their own direct marketing purposes, unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. When you are using our secure online payments pages, your payment is processed by a third-party payment processor, who specialises in the secure online capture and processing of credit/debit card transactions. If you have any questions regarding secure transactions, please contact us.

## How you can access and update your information

The accuracy of your information is important to us. We're working on ways to make it easier for you to review and correct the information that we hold about you. In the meantime, if you change email address, or any of the other information we hold is inaccurate or out of date, please access the British Gymnastics and the PaySubs Online websites to update them. Note: These sites are not linked, you must ensure that both listings carry accurate, updated and identical information.

## Individual rights

You have the right to see the personal information we hold about you. You can log in to the British Gymnastics web site, and under GymNet go to 'My Account' at any time to view/amend/delete the information we hold about you on this system. You can also request a copy of any other information we hold by writing to us.

If we do hold other information about you, you can ask us to delete it or correct any inaccuracies. We will either make the requested amendments or provide an explanation as to why we are not making changes.

If you leave the club, you can amend your club registration by logging into 'My Account'. If you do this, the information you have provided will be archived for 60 days. During this period, you

can transfer your information to another club. After this period, the information you have provided will be deleted, except where there is a legitimate and lawful reason to continue to hold your data. In the absence of a legitimate and lawful reason to retain any other information we hold about you, this will be delete after 12 months, unless you re-join the club within that period.

We are legally required to hold some types of information for specific periods to fulfil our statutory obligations (for example the collection of Gift Aid).

We will hold any other personal information on our other hosted systems only for as long as is necessary for the relevant activity.

## Security precautions in place to protect the loss, misuse or alteration of your information

When you give us personal information, we take steps to ensure that it's treated securely. Any sensitive information (such as credit or debit card details) is encrypted and protected with the following software 128 Bit encryption on SSL. When you are on a secure page, a lock icon will appear on the bottom of web browsers such as Microsoft Internet Explorer.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

### Use of 'cookies'

Like many other websites, the British Gymnastics and PaySubs online websites may use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. For example, cookies may be used to store your country preference. This helps to improve websites and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. For more information on how to switch off cookies on your computer. Turning cookies of may result in a loss of functionality when using our website.

#### Links to other websites

Our website may contain links to other websites run by other organisations. This privacy policy applies only to our website, so we encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third-party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party site and recommend that you check the policy of that third-party site.

#### Under 18's

We are concerned to protect the privacy of children aged 18 or under. If you are under 18 years of age, please get your parent/guardian's permission beforehand whenever you provide us with personal information.

#### **CCTV**

CCTV is operational for the protection of the children and staff and (in the event of a complaint) identifying behaviour that conflicts with the relevant code of conduct.

CCTV images are collected at the Clarendon Park venue. Retention of the images is 90 days whereupon the images will be over written.

In the event of a reported or suspected incident, a copy of the alleged incident will be taken and retained until the incident is closed. The copy will then be destroyed.

Access to the CCTV is restricted by:

- Key coded entry into the control room
- Server access user id and password requirements
- The application viewing password requirement process

## Review of this Policy

We keep this Policy under regular review. This Policy was last updated on 16<sup>th</sup> November 2017.