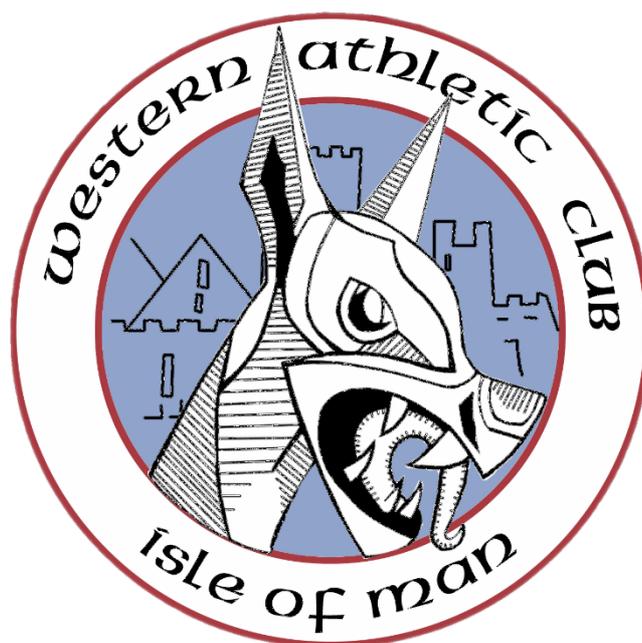


# Western Athletic Club



## Privacy Policy & GDPR

<b>Date of issue:</b>	<b>September 2020</b>
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## 1 Who are we?

We are Western Athletic club.

The activities of the Club covers road running, track & field, cross country and the Summer Park Runs. Training is offered by qualified UKA Coaches, together with Strength and Conditioning sessions.

Our club welcomes all members of the community, regardless of their abilities.

We can be most easily contacted through email at [wac@manx.net](mailto:wac@manx.net). Written correspondence may be addressed to Rosie Morrison, Club Secretary, 7A Boilley Spittal. Peel. IM51BW

## 2 Abbreviations used in this policy together with relevant explanations

"the Club", "we" and "our"	Western Athletic club.
GDPR	The General Data Protection Regulation in the Isle of Man, as regulated by the Isle of Man Information Commissioner.
IOMAA	Isle of Man Athletics Association - the governing body for athletics in the Isle of Man.
"UKA"	UK Athletics - the governing body for the sport of athletics in the United Kingdom. It is responsible for overseeing the governance of athletics events in the UK as well as athletes).
Power of 10	Power of 10 provide a comprehensive results and rankings service for the sport of athletics and is supported by UKA, England Athletics, Scottish Athletics, Athletics Northern Ireland, Welsh Athletics and the underlying Clubs registered with these governing bodies, including Western(Isle of Man) Athletics Club.
DBS	The Disclosure and Barring Service, Department of Home Affairs, Isle of Man Government. This is an Executive Agency of the UK Home Office. The DBS helps employers and voluntary organisations to make safer recruitment decisions.

## 3 About this Policy.

This policy explains when and why we collect personal information about our members, competitors and other stakeholders, how we use it and how we keep it secure. The policy also details your rights if you feel that the Club has not met its obligations as required by the Isle of Man Information Commissioner.

A summary of our policy is as follows:

- 3.1 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.
- 3.2 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website <naciom.org> or contact the Club (see Section 1 above).
- 3.3 We will always comply with GDPR when dealing with your personal data. For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

**4 What information we collect and why.**

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
Member's name, address, telephone numbers and e-mail addresses.	<p>Managing the membership of the Club.</p> <p>Registering competing members with UKA.</p> <p>Drawing up Club's Track &amp; Field Championship schedules in relevant age groups.</p> <p>Advising and organising competitions. Training and advising on issues solely related to athletic development or Club funding activities.</p> <p>Satisfying any audit requests for an auditor to gain assurance on the completeness and accuracy of the Club's Annual Accounts.</p> <p>To answer your queries or complaints.</p>	For the purposes of our legitimate interests in operating the Club, running competitions and organising visits to UK competitions.
Member's medical information.	Medical information is used for members' safety and wellbeing when taking part in Club training activities and Club competitions.	Specific permission given by member form for the purposes of legitimate interests in operating the Club.
Date of birth.	Organise competitors into relevant age bands for competing under UKA Rules.	For the purposes of our legitimate interests in operating the Club.
Gender.	Organise competitors into relevant bands for competing under UKA Rules.	For the purposes of our legitimate interests in operating the Club.
Emergency contact details.	Contacting named party in the event of emergency.	Specific permission given by member form for the purposes of legitimate interests in operating the Club to safeguard members when taking part in Club activities.
Athletic performances.	<p>To assist members in the type and progression of training schedules.</p> <p>To display Club results from organised competitions.</p> <p>To submit results to Power of 10, for recognised events.</p>	Specific permission given by member form or competitor form for the purposes of legitimate interests in maintaining Club records indefinitely.

**What information we collect and why - continued.**

<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
Qualifications for coaching and officiating in road running, road walking races together with track and field events.	Monitor Club's ability to administer Club competitions and to attract and develop new volunteers.	For the purposes of our legitimate interests in operating the Club events.
Vetting information for Club Coaches and Club Officials responsible for giving training and coaching.	For the protection and welfare of training Athletes.	Criminal checks are obtained on the basis of legal obligations and explicit consent.

**5 Retention of personal data.**

Club Members information will be retained during the UKA Registration year ending 31 March. Records for each year obtained from members will be destroyed on the earlier of:

- written notice that the member no longer wishes to be a member of the Club; or
- completion of all formalities to transfer the member to another Athletics Club; or
- receipt of a new member form for the following year; or
- four months after the deadline to renew UKA Registration and the member has not submitted a member's form to renew membership nor transferred to another club.

Race entry forms will be retained until results are processed for the competition which may be, for a league, over several months.

Basic contact details from donors will be retained until it is evident that, in all likelihood, the donor no longer supports the Club.

The Club's Annual Accounts and minute book will be held indefinitely as part of the Club's administrative responsibilities.

Supplier invoices will be retained until one year after the relevant period's Club Accounts have been prepared and agreed at Club's Annual General Meeting.

**6 Sharing of personal data.**

It is the Club's policy not to share any personal data with any third party, apart from standard administration purposes within Athletics and legal requirements, as follows:

<b>Organisation</b>	<b>Reason</b>	<b>Data transferred</b>
UKA	Administration of athletes' data to allow members to complete in UKA recognised events in UK.	Name, sex, date of birth and contact details.
Local press and Power of 10	Publicity for Club events and general interest.	Photographs, name, age (where relevant), result (e.g. time or distance) and position within the competition.
IOMAA	For selection criteria to enable athletes to compete for the Island Team in various athletic competitions both on and off the Island.	Photographs, name, age (where relevant), and result (e.g. time or distance) and position within the competition.
Police	To assist with their investigation of criminal activity.	Any data held on subject.

## **7 Accessing your data.**

You have a right to ask for a copy of the information which we hold about you. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, in these circumstances we may refuse to comply with the request.

## **8 Your rights.**

Under certain circumstances, you have the right to:

### **8.1 Request correction of the personal information that we hold about you.**

This enables you to have any incomplete or inaccurate information we hold about you corrected.

### **8.2 Request erasure of your personal information.**

This enables you to ask us to delete or remove personal information where there is no longer a good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below), but this would also mean that the Club would have no alternative but to terminate membership. In any event, the Club considers historic records of Club competitions to be static permanent records that we retain in the Clubs statistical records indefinitely.

### **8.3 Object to processing of your personal information.**

You also have the right to object if the Club were processing your personal information for direct marketing purposes. However, it is stressed that it is not the Club's policy to market personal information to third parties.

All such requests may be sent through the Club's email address at [wac@manx.net](mailto:wac@manx.net). Written correspondence may be addressed to Rosie Morrison, Club Secretary, 7A Boilley Spittal. Peel. IM51BW.

Your complaint will be investigated by the Club's Committee under the terms of this policy and will respond to you within one month. Please also refer to Section 9 below.

## **9 Club's responsibility to report data breaches.**

If the Club experiences a personal data breach (please see definition below for guidance) we will consider whether this poses a risk to people. We will consider the likelihood and severity of any risk to people's rights and freedoms, following the breach. When we have made this assessment, if it is likely there will be a risk, then we will notify the Isle of Man Information Commissioner. However, if it is unlikely then we will not report the incident.

In any event the Club will review its policy and procedures to ensure it can meet the requirements of GDPR, and record our investigation path and decisions at the next Club Committee meeting which will also be duly recorded in the Club's Minute Book.

For the avoidance of doubt, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

**10 You have the right to make a complaint at any time to the Isle of Man Information Commissioner:**

Address	First Floor, Prospect House, Prospect Hill, Douglas, Isle of Man. IM1 1ET
Website	<a href="https://www.inforights.im/">https://www.inforights.im/</a>

**11 Frequency of policy review**

The policy will be reviewed annually by the Club's Committee.