

Welsh Gymnastics Privacy Policy – Membership

Your privacy is extremely important to Welsh Gymnastics (WG) and we are fully committed to providing you with clear and transparent information about how we use your personal information. We value the trust you give us when sharing your personal information. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this policy.

About us

Welsh Gymnastics (WG) is a not-for-profit membership organisation and the central body that governs the sport of gymnastics in Wales.

When you join WG, you can, if you wish, attach your membership to the WG registered club(s) where you participate in gymnastics.

Click here to access Membership Rules.

When you join Welsh Gymnastics, WG will act as data controllers; the purpose for which information is used is in accordance with this privacy notice.

This privacy policy explains:

- What information we collect about you
- How we use your information for contractual purposes
- How we use information about you for legitimate purposes
- How we use your information for statistical purposes
- Other lawful reasons for using information about you
- Other processing activities
- Why we share information about you
- Marketing
- Your rights in respect of your personal information

What information we collect about you

When you register as a Welsh Gymnastics member or renew your membership (or you register or renew on behalf of a child under the age of 18), we need to collect information about you. Some of this information is essential for us to provide your membership but it is your choice whether you provide all the information we have requested. Not providing information may affect our ability to provide all the benefits of membership to you.

- Your name (and the name of the member if they are under 18) and preferred title.
- Date of birth and gender.





- Contact details (telephone, email and postal address).
- Confirmation of the role(s) you undertake in the sport e.g. gymnast, coach, judge, club manager and safeguarding and well-being officer.
- Whether you are a competitive gymnast and, if yes which home country you represent.
- Payment and transactional information (if you are paying for your own membership). We do not store any credit/debit card details.
- Name of club to which you wish to be attached (if this is required).
- The nature of your participation in the sport. This includes the number of hours and days you spend participating in the sport and the type of gymnastics in which you/your child participate/s.
- Your equality profile (or your child's profile if you are registering on their behalf). We invite you to confirm sex, whether there is a difference between gender identity and sex assigned at birth, disability, ethnicity/race, religion/belief and sexual orientation (over 18 years of age only).

We may also collect the following other information about you:

- Records of communications from, to or relating to you.
- Details of gymnastics qualifications/awards you hold, training you have completed and workforce license records (jointly with British Gymnastics).

How we use your information for contractual purposes

When you register as a member of WG, we need to use your personal information to provide the services to which you have subscribed. We will set up your WG membership account and use your email as a login and to send you electronic confirmation of your membership number.

We will use your information to provide you with our core member services, including insurance and access to voting (subject to membership type) and other membership services that you request. We will send your membership pack by post but will normally send any essential membership service messages by email. Any communications will be relevant, timely and not excessive.

• British Gymnastics

When you join Welsh Gymnastics, you will also receive <u>associate membership</u> of British Gymnastics. Welsh Gymnastics will share data that will enable you to access the BG services (i.e. competitions, squads and learning academy) with British Gymnastics who will process your information for which the information about you is used in accordance with their <u>privacy policy</u>.

Click here to access <u>British Gymnastics Privacy Notice</u> to learn more about your information will be used by British Gymnastics



How we use information about you for legitimate purposes

We process personal information about you where we have a legitimate interest to do so. In some cases, this may require us to collect additional information from you or from other sources. The purposes include:

• To respond to your questions and support needs you raise in person or by telephone, email or letter or via our website.

If you provide your membership number, we will maintain a log of any important calls, emails and correspondence requesting support on your membership record. We may compile anonymous statistical reports showing information like the number and type of query and how they have been resolved. Occasionally we will use information provided to develop case studies for learning and development purposes. We will be very careful to ensure that any information that could identify a person will be removed or changed to preserve anonymity.

• To monitor whether our electronic communications are received and opened to help us monitor the effectiveness of our communication methods and to make improvements.

• To provide and promote gymnastics competition.

If you have registered as a competitive member and have agreed for your club to enter you into a WG competition, we will use your personal information to confirm you have been entered into the correct category and to enable you to participate in the event. All WG competitions are large events where photography and filming by WG accredited photographers and the media may take place. In the case of national championships and other major WG events, the event may be videoed and/or live streamed. Images taken at our events may be used by WG for the purposes of promotion, education and development of the sport. They may also be shared with relevant third-party organisations e.g. Sport Wales and Team Wales for journalistic/promotional purposes. The results of WG competitions are published on our website.

• To understand member needs and monitor the nature and level of participation in the sport to help develop our services and for funding purposes.

We need to understand how our members engage in the sport to help develop and monitor our strategy. We receive funding support from Sport Wales to support the delivery of participation and high-performance programmes. We must provide information to these funding partners to demonstrate that we have achieved the agreed targets. Generally, information is provided in an anonymised format





• To send you information by post and/or email that we think will be of interest to you, including from our partner organisations. <u>www.welshgymnastics.org/partners</u>. You may unsubscribe from these messages at any time.

• To invite you to participate in WG research.

On occasion, we invite our members to participate in research to help us understand your views and needs and to develop our services. In some instances, we ask external research companies to carry out this research on our behalf. You may be contacted by email inviting you to participate.

• To invite you to a WG event as an award winner or guest.

We like to recognise the efforts made by members as gymnasts or in supporting others to take part and have a positive experience in the sport. We hold an annual award ceremony and invite our registered clubs to nominate individual members who have made a significant contribution to the sport and provide information to support the nomination. We will use the information provided to prepare a short list and select the winners who will be contacted by post unless we have the relevant member's agreement to send marketing communications by email.

- To invite you to tutor, assess, coach, judge, train or officiate at relevant WG events in line with your qualifications/awards/performance.
- To verify that you have completed any training and suitability checks relevant to the role you undertake.

If you undertake a role in WG where you are required to complete safeguarding training, we may need to request evidence of your training and will maintain a record of when you completed this training and when it need to be refreshed. We also maintain a record of any other training and professional development you have completed under WG and with external providers.

• To respond to complaints, concerns or allegations about anyone involved in the delivery of gymnastics activity.

When we receive a complaint, concern or allegation, we create a case file containing the details of the matter raised. Case files are held securely and are not accessible on your membership record, particularly as the file normally contains not only the identity of the complainant but also other individuals involved in the complaint and other relevant non-personal information.

We will only use the personal information we collect to investigate and respond to the case and to monitor the service we provide. We usually need to share the complainant's identity with whoever the complaint is about, and, in many cases, this will be clear from other details provided in the complaint. If a complainant does not want information identifying them to be disclosed, we will try to proceed but it is often not possible to handle a complaint on an anonymous basis.



Where a complaint is extremely serious WG may need to suspend membership of the person under investigation pending the outcome of enquiries. WG may communicate the suspension with British Gymnastics and Scottish Gymnastics. This information will be restricted and only shared on a 'need to know' basis. We may share limited but adequate information through the Safeguarding and Well-being Officers of the relevant registered club/s to ensure our members are protected.

In some cases, WG may take disciplinary action against a member. These proceedings are normally held in private but we may publish the outcome of proceedings where there is a legitimate interest that overrides the interests of the individual in keeping the outcome private.

We may compile anonymous statistical reports showing information like the number and type of complaints and outcomes. Occasionally we will use information provided in complaints to develop case studies for learning and development purposes. We will be very careful to ensure that any information that could identify a person involved in the case will be removed or changed to preserve anonymity.

You have the right to object to any of the processing we undertake based on legitimate interests. P<u>lease</u> click here for an objections form. Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit. There may be circumstances where we are obliged to continue to process your personal information despite your objection and if this is the case, we will explain this to you.

How we use your information for statistical purposes

We are committed to promoting equality and diversity at every level of the sport and believe that none of our members should be discriminated against or receive less favourable treatment on the grounds of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation (together these are known as the 'Protected Characteristics' under the Equality Act 2010). We aim to ensure our services are fully inclusive and accessible to everyone. To make this possible we need to collect information on the equality profile of our membership which will help us review the accessibility of our services. Your equality profile is confidential and will only be accessible to data analysts and IT staff for system maintenance purposes.

This data is very important to us as it enhances our understanding of member needs and helps us to monitor the impact of initiatives we implement to increase participation. We appreciate that not everyone is comfortable sharing this information so every question allows you to respond by selecting the "prefer not to say" option. We will confirm that you understand and agree for your equality profile information to be used for anonymous statistical purposes and you can amend your responses at any time. If you change your mind, you can amend your settings in 'my account' and we will delete this information from your record.





Accurate information on the equality profile of our membership helps us identify areas of underrepresentation. We look at the percentage of our members that fall into specific protected characteristics and the services accessed and/or the nature of participation. This information is compared against national or local census data to establish whether we are representative of the community we aim to serve. This information is vital as it helps us identify where we need to target equality initiatives and inclusion strategies.

Other lawful reasons for using information about you

We may need to process information about you to comply with a legal or statutory obligation. This includes but is not limited to:

- As part of our response to any accident or incident in a WG regulated environment.
- Accounting, auditing, compliance and administration practices.
- To maintain records of amendments to consents and to create suppression lists to ensure people who object to processing are excluded from the relevant processing activity.

We may also need to use information about you relating to the above activities to exercise or defend legal claims.

Other processing activities

We undertake some other activities and offer a range of additional services to members. We may need to collect additional information about you as part of these activities and services. They include:

- Competitions and events.
- National squads and clinics.
- Disability classification.
- Coaching and judging qualifications.
- Learning and development activities e.g. conferences, leadership programmes, training courses and seminars
- Research including surveys, focus groups and interviews.

Additional notices about the information about you that we collect and how we will use it will be provided to you at the point that you are invited to participate in, register for or access any of the above activities or services.

Why we share information about you

We have a legitimate interest in sharing your personal information with our partner organisations and your registered club to ensure the sport is safe and well-governed across the UK.

• Competition Organisers

If you qualify to participate in a competition or event that is organised by another associated organisation e.g. Commonwealth Games Council, we will confirm with the relevant organiser the information that is required to ensure that you meet the eligibility criteria to take part in the event.





Any information shared will be limited to what is strictly necessary to achieve this purpose. This may include your date of birth, qualifications and confirmation that you meet any relevant compliance/safeguarding requirements.

If you register for a competition or event that is organised by one of our Areas where WG membership is a condition of participation, we will confirm with the relevant organiser if you hold membership and any additional information required to ensure that you meet the eligibility criteria to take part in the event. Any information shared will be limited to what is strictly necessary to achieve this purpose. This may include date of birth, qualifications and confirmation that you meet any relevant compliance/safeguarding requirements.

If you are a judge, we will, share your name, judging award details and contact information with the with Area competition organisers so that they can invite you to judge at appropriate competitions.

You have the right to object to any of the above sharing of your information which we do so on legitimate interest grounds. <u>please click here for an objections form</u>. Please bear in mind that if you object this may affect our ability to carry out the tasks above for your benefit. There may be circumstances where we are obliged to continue to process your personal information despite your objection and if this is the case, we will explain this to you.

Other reasons we share information about you:

We may also need to share limited personal information with the following organisations where it is necessary to provide the services you have requested or where we are required or authorised to do so by law.

• Gymnastics Rewards

When you join Welsh Gymnastics you can access the Gymnastics Rewards system. Only your membership number is shared by Welsh Gymnastics, and you can sign up to create a profile.

• Awarding body for qualifications

If you register for a coaching course where the qualification is assessed by an external awarding body, e.g. 1st4Sport and UKCoaching, we will need to share your name, date of birth and any special requirements with the Awarding body. We will also need to share your information with the course tutor and assessor to administer your course and assessment.

• Statutory/regulatory authorities and other organisations

On occasion, it may be necessary to share information with bodies such as the Health & Safety Executive (HSE), Information Commissioner's Office (ICO), Disclosure Scotland and the Police or Social Services.





We may also share information with other relevant organisations to safeguard children. Any information that is shared will be strictly limited to what is required to ensure children are protected from harm and will be carried out in accordance with the law and relevant government guidance.

• Professional and legal advisors

• Performance programmes

If you are part of a performance programme your limited details will be shared where required to access services (e.g. competitions, travel). This will also be included within your squad packs.

• External Service providers who are contracted to provide specific services on behalf of WG

We may use the services of a third-party provider to help us in certain areas, such as electronic communications, competition programming, live scoring, printing and fulfilment, club support services, photography and filming and market research. In some case, we may be required to share your personal information, such as your contact details with the external provider. We limit the personal data that we share to the minimum required to provide the service and the provider will only be able to use personal data for the specific purposes for which it was shared.

Marketing

With your consent, we will use your email address to send you the latest news and information about gymnastics that we believe may be of interest to you.

How we determine what might be of interest to you - By looking at your participation profile as well as any additional information which you have shared with WG we can identify news, offers and services that are most likely to be most relevant and will meet your needs as a member.

When we send you a marketing communication, we monitor whether you have opened the communication and clicked on any included links. This will enable us to track and analyse your level of engagement/interest in the communication we are sending you and will provide us with further insight on what type of communications are most of interest to you.

These communications will include newsletters, information about opportunities, products, services and events and relevant information from our partner organisations. <u>Click here for a list of our partners</u>.

We use MailChimp, a US-hosted third-party provider to send out our marketing communications who are certified as adhering to the EU -US Privacy Shield. For more information, please see MailChimp's privacy notice - <u>https://mailchimp.com/legal/privacy</u>.

If you agree to any of the above marketing, and later change your mind, you can opt out at any point, by amending your settings in 'my account'. Alternatively, you can use the 'unsubscribe' link at the end of the electronic communication but this will unsubscribe you from all marketing communications.

Your rights in respect of your personal information





Accessing your personal information

You have the right to see the personal information we hold about you. This is called a Data Subject Access Request (DSAR). You can log in to your account at any time to view the information we hold about you on your membership account.

You can also request a copy of any other personal information that we hold by writing to us at the address below. Alternatively, if you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If you wish, you can make your request using the WG DSAR form.

If we do hold information about you, we will:

- Describe the information we hold and tell you why we are holding it;
- Tell you who it could be shared with; and
- Provide you with a copy of the requested information in an easy to understand format.

Rectification and erasure

If we do hold information about you, you can ask us to correct or amend any inaccurate or incomplete information by contacting us in writing at the address below. We will either make the requested amendments or provide an explanation as to why we are not making changes.

You can also log in at any point to amend or delete information held in your membership account that has changed or is no longer accurate.

Retention

We will retain your personal data only as necessary to provide the services to which you have subscribed. At your request or if you do not renew your membership within two years, unless you ask us not to, we will delete any information that we no longer have a legitimate reason or legal obligation to retain. We need to retain sufficient information about you in the event of an insurance claim in the future so that we can identify you and confirm that you held membership for the relevant period. We may need to retain other information to comply with legal or statutory requirements. As the reason for retaining certain types of information varies, the retention periods can vary significantly. Please contact us directly if you require further information on specific retention periods.

Other rights

You have a right to have any data that is incorrect, corrected. If you find any data that we hold is incorrect or there are any changes, for example you move address, please get in touch with us to let us know. You also have the right to have your data provided to you to take elsewhere in a suitable format, again, please simply contact us and let us know how we can help.

You also have the right to lodge a complaint about our use of your data with the Information Commissioner. Details for the Information Commissioner and making a complaint can be found on their website at <u>www.ico.org.uk</u> though we do ask that you give us an opportunity to address your concerns first.





Changes to the privacy policy

We keep our privacy notices under regular review. This privacy notice was last updated on 29.09.23.

How to contact us

If you want to request information about our privacy policy or have any questions or concerns about your personal data, you can email or write to us at:

Welsh Gymnastics Sport Wales National Centre Sophia Gardens Cardiff CF11 9SW <u>contactus@welshgymnastics.org</u>



