



# London & South East Region Netball Association

## Privacy Policy

London & South East Region Netball Association (L&SERNA) is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with data protection laws.

This policy covers the different elements of personal information that is collected, what we do with the information, how long we will hold it, what we will not do with the information, as well as what rights individuals have to review what data we hold about them.

### Introduction to Data Protection

We have an obligation under General Data Protection Regulation (GDPR) to provide you with information about how and why we use your data. We recognise our obligations and your legal rights set out in the GDPR. We are committed to protecting and respecting your privacy by complying with the principles of the GDPR.

### Who are 'we'?

In this policy, whenever you see the words 'we', 'us' or 'our', it refers to L&SERNA. We are the Regional Netball Association responsible for netball delivery in the London & South East Region (the Region). L&SERNA is the controller of all personal data processed by L&SERNA.

### Data Protection Officer

L&SERNA does not have a Data Protection Officer. However, for information and queries about data protection compliance, contact our Data Protection Lead, email: londonandsoutheast@englandnetball.co.uk telephone: 0207 993 4709 or write to:

London & South East Region Netball Association

House of Sport, 190 Great Dover Street

London, SE1 4YB

### Amendments to our Privacy Policy

If we amend our Privacy Policy, any changes will be published on our website. If necessary, this will be brought to your attention.

This Policy was last updated on: \* September 2021.

### What is personal data?

'Personal data' means any information relating to a living individual ('data subject') who can be identified, directly or indirectly, by the information we hold.

### The types of personal data we may collect

The data we collect about you will vary, depending on our relationship with you. Below are examples of the sorts of data that we may collect:

- Full name and personal details (e.g., photograph, driving licence)
- Contact information (e.g., home address, email address, telephone numbers)
- Date of birth and/or age
- Next of kin and emergency contact information
- Imagery in video and/or photographic form and voice recordings
- Records of participation at events/sessions/competition
- Records of enquiries and other correspondence with you
- Marketing email lists
- Suppliers and sponsors
- Family, lifestyle or social circumstances
- Membership details including start and end date and any regions, counties, leagues and clubs of which you are/have been a member
- Coaching/teaching/officiating qualification and/or history
- Records of any courses or sessions attended/enquiries
- Records and assessment of any player rankings, gradings or ratings, competition results, details regarding events/matches/games attended and performance
- Any disciplinary and grievance information
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us
- Any payment details you provide so that we can perform financial transactions with you
- Any details required for the purposes of awarding scholarship funding or grants (including any means testing)
- Records of your attendance at any events or competitions hosted by us
- Your marketing preferences so that we know whether and how we should contact you
- Membership of L&SERNA's Regional Management Board, its Technical Support Groups and Working Groups
- Membership of Academies
- Names of Member County and Regional club Covid-19 Officers

### **Special categories of personal data**

We may also collect, store and use the following 'special categories' of personal data regarding you:

- Information about your race, ethnicity, disability or sexual orientation
- Information about your health, including any medical condition, health and sickness records, medical records and health professional information
- Criminal records information

We may not collect all of the above types of personal data about you. In relation to the special category personal data that we do process, our basis for processing this information is indicated in the 'How we use your personal information' section below and, in addition, we will have obtained your explicit consent to do so.

### **How we use your personal information**

We collect, store and process personal data for several purposes, mainly: to inform members and other interested parties about netball activity within the Region such as events, competitions, leagues, courses and promoting further opportunities, financial accounting, and marketing. We will not use any of the information that we collect from you, or about you, for any purpose other than those listed in this document or for purposes that are similar. If we would like to use your personal data in any other way, we will present you with relevant information at the point at which one of these additional purposes arises.

The GDPR provides that legally we might hold and process your information for any of the following four reasons and we have included below a summary of what that means for L&SERNA and how we might use information you provide to us:

Where required to perform a **CONTRACT**. For example:

- To administer and manage our relationship with members
- To send members information which is included within their regional membership benefits package
- To administer attendance at competitions, events, or training
- To fulfil our contractual relationship with third parties such as sponsors and suppliers

Where required to comply with our **LEGAL OBLIGATIONS**. For example:

- To comply with health and safety requirements. For example, to ensure the safe running of netball sessions and to enable adaptations to be made
- To comply with safeguarding requirements. For example, whilst working with children or vulnerable adults
- To ensure we are offering equitable access to our services and to avoid discrimination
- For the prevention of fraud and other criminal activities

Where there is a **LEGITIMATE INTEREST**. For example:

- To correspond and to answer queries and complaints
- To understand the availability of the coaching, officiating, and volunteering workforce
- To comply with awarding bodies' accreditation obligations
- To administer and monitor attendance at events and competitions.

Where you have provided **CONSENT**. For example:

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

- Promoting our sponsors' or partners' services
- Marketing
- Inclusion on list of Regional Board Members, its Technical Support Groups and Working Groups

### **Retaining your information**

Where we collect your personal information, the length of time that it is retained will be determined by a number of factors, including the purpose for which we use that information and to comply with our other legal obligations (apart from GDPR). We maintain a Retention Schedule, which records approved retention periods, the reasoning for the retention period and end of life treatment.

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- Financial information – 7 years
- Special category data-6 years, unless required for a longer period in relation to any legal claim
- Disciplinary information – 5 years
- Participation in leagues – 2 seasons
- Course attendance/qualification – indefinitely
- Correspondence/enquiries – for the relevant season or, if later, until resolved or for such longer period as required by England Netball's policy for its staff
- Names of Member County and Regional club Covid-19 officers – for the relevant season
- Zoom recording of meetings – until any relevant minutes have been formally approved

At the end of the relevant retention period or when any data is no longer required, it is deleted. We do not retain personal information in an identifiable format for longer than is necessary. Where you have consented for us to retain your data, we will only hold the data for the duration of your consent.

## **Young People Aged 14 to 17**

Young people's data will be collected and processed in accordance with the information below. Parents and guardians are required to ensure that the young people they are responsible for, are aware of how their personal data will be processed by us.

## **Children Aged Under 14**

We require prior parental or guardian consent before we process any personal data.

### **Using your information for marketing**

We only send marketing information to you if you have explicitly agreed to our doing so or have requested it and we will only do so in the way(s) you have agreed to. You can withdraw consent at any time. See below for more information.

Marketing information covers information about tickets to events, special offers, opportunities, products and services and other commercial information.

In connection with information about tickets, special offers, opportunities, products and services and other commercial information, the categories have been divided into two groups:

- from L&SERNA
- from L&SERNA about its sponsors and partners

If you want to receive information from either of these two groups but have not previously requested it, you can do so by emailing the Data Protection Lead: londonandsoutheast@englandnetball.co.uk.

### **Withdrawing consent**

If you no longer wish to receive information from either of these two groups list above, please email the Data Protection Lead: londonandsoutheast@englandnetball.co.uk.

### **Sharing your personal data and data processing**

We only share personal data where we are required by law or with our suppliers or sub-contractors who carry out work for us and who you have given us permission to share it with. Other than the circumstances set out above, information about you will not be passed to a third party for any other purposes. All our suppliers and sub-contractors are required by their own data sharing agreements or contracts to treat your data as carefully as we would, to use it only as instructed, and to allow us to check that they do this.

Organisations we share your personal data with:

- All England Netball Association
- County Netball Associations within the London & South East Region
- England Netball Member Leagues registered within the London & South East Region
- England Netball Member netball clubs registered within the London & South East Region
- Other organisations within England Netball
- Companies, sub-contractors and other persons who help provide courses, programmes, products and services (typically this will include school, colleges and leisure centres where programmes are run)
- Data processors: for example, education and training providers, professional services, legal, financial and information technologies that help to improve your products or services
- Where the law requires it. We may disclose your personal information to third parties if we are under a duty to comply with any legal obligation; to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of our customers, or others, including exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction
- Anyone else where we have the data subject's consent

## **Profiling**

L&SERNA does not perform any profiling that has legal or significant effect nor any automated decision making.

## **International transfer**

The personal information we collect may be transferred to and stored in countries outside of the UK. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are resident. We will take all reasonable steps to ensure that your personal information is used only in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf, we will put in place appropriate safeguards as required under data protection laws.

International organisations we work with:

- Dropbox. a secure online file sharing and storage platform. It may store, process, and transmit information in the United States and locations around the world. Information may also be stored locally on the devices used to access the Services.
- SurveyMonkey is used to facilitate the sending of surveys
- Google Cloud Platform is used for Google Docs

## **Information Security**

Where we have given you (or where you have chosen) a password, which enables you to access certain parts of our website, or membership portal, it is your responsibility to safeguard your password against the possibility that others may use it to gain unauthorised access. Do not store your password anywhere, in written or electronic form, or give it to someone else. Please let londonandsoutheast@englandnetball.co.uk know if any record containing your password is lost or stolen or if you think there has been a possibility that your security has been breached.

## **More on Information Security**

We do our very best to keep personal information secure wherever we collect personal data online. We place a great importance on the security of all personally identifiable information associated with our members, supporters, volunteers, customers, and users. We will take all steps reasonably necessary including policies, procedures, and security features to ensure that information about you is treated securely and protected from unauthorised and unlawful access and used in accordance with this privacy policy. We have security measures in place to attempt to protect against the loss, misuse, and alteration of personal data under our control or being transferred, we use our best efforts to try to prevent this.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites 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 data to these websites.

## **What we will NOT do with your information**

We never sell or share personal information with other organisations for them to use for their own purposes.

## Your rights

The GDPR grants you certain rights ('information rights') which we summarise below.

Right of access	You have the right to obtain confirmation from L&SERNA as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right to access that personal data.
Right to rectification	You have the right to oblige L&SERNA to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement.
Right to erasure (right to be forgotten)	You have the right (under certain circumstances, but not all) to oblige L&SERNA to erase personal data concerning you.
Right to restriction of processing	You have the right (under certain circumstances, but not all) to oblige L&SERNA to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you.
Right to data portability	You have the right (under certain circumstances, but not all) to oblige L&SERNA to provide you with the personal data about you which you have provided to L&SERNA in a structured, commonly used and machine-readable format. You also have the right to oblige L&SERNA to transmit the data to another controller.
Right to withdraw consent	If the lawful basis for processing is consent, you have the right to withdraw that consent.
Right to object to direct marketing	Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing.
Rights in relation to automated decision making and profiling	L&SERNA does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.

## Your right to lodge a complaint with a supervisory authority

If you wish to exercise any of your rights concerning your personal data, you should contact us at [londonandsoutheast@englandnetball.co.uk](mailto:londonandsoutheast@englandnetball.co.uk) or write to us at: London & South East Region Netball Association, House of Sport, 190 Great Dover street, London, SE1 4YB.

L&SERNA is not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act.

If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 0303 123 1113, email: [casework@ico.org.uk](mailto:casework@ico.org.uk).