

Sport Structures Privacy Policy

Version 1: Updated 24th May 2018

Introduction

Sport Structures (“we”, “our”, “us”) are committed to respecting your privacy. We would encourage you to read this policy carefully to understand how we will gather and use the personal information we collect from you. It applies to information collected by us, or provided by you, when using our website, as well as in other circumstances when we collect data from you (including via email). It is intended to assist you in making informed decisions when using our website and products and services.

This policy is applicable to you if you are:

- A coach, apprentice, volunteer, teacher, official or a coach educator who has registered to attend an education course, workshop or qualification;
- A customer who has contacted us to find out more about our training courses, apprenticeships and education services we offer;
- An individual representing an organisation who has contacted us to find out about our cross-company products and services; or
- An individual participating in a project that we manage or have some involvement in

Controller

The Sport Structures brand covers two companies;

Sport Structures Limited

Company number: 4492940

VAT number: 783 9346 80

Sport Structures Education CIC

Company number: 6591600

VAT number: 915 2882 15.

The Sport Structures brand is the controller of your information for the purposes of the GDPR.

Contact details

We have appointed a Lead Officer on Data Protection who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, including any request to exercise your legal rights, please contact us using the details below:

Email: info@sportstructures.com

Address: Sport Structures, Suite 8 The Cloisters, 12 George Road, Edgbaston, Birmingham, B15 1NP

Phone: 0121 455 8270

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the supervisory authority for data protection issues in the UK (phone: 0303 123 1113 or at www.ico.org.uk/concerns). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please feel free to contact us in the first instance.

Changes to this Privacy Policy and changes to your details

We will need to update this Privacy Policy from time to time as the law and/or our organisation changes and develops. If changes are made to the policy, we will update the version date at the top of this page. We will endeavor to tell you in advance by sending a message to you if we hold your email address. If you continue to use our websites and/or services after we have changed our privacy notice, we will take this as an indication that you accept the changes.

Third party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website, plug-in and/or application that you visit.

Personal information we may collect from you

When you register with us or purchase a product or service from us, you may provide us with, or we may obtain personal information about you, such as information regarding your:

- Personal contact details i.e. name, title, address, email addresses, telephone numbers, emergency contact name and number
- Personal details i.e. date of birth, gender;
- Records of interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- Bank, credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you
- Use of and movements through our website portal, user names and other IT system identifying information;
- Records of your attendance at any courses or events hosted by us;
- Images in video and/or photographic form and voice recordings; and
- Marketing preferences so that we know whether and how we should contact you.

Coaches, volunteers, teachers, officials, coach educators and apprentices

If you have registered with us as a member of our workforce or to attend an education course/workshop/qualification or any of our education products or services, you may also provide us with, or we may obtain the following additional personal information from you (if applicable):

- A coach membership number
- Your affiliated club or other organisation
- Your coaching / tutoring/ assessing / quality assurance history
- Evidence of relevant qualifications
- Accreditation/qualification start and end date
- Identification documents such as passport, utility bills, driving license etc.

Sensitive data

In certain situations, we have to collect sensitive data about you. Under data protection law this is known as "special category" data and includes details about:

- your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions
- your health, including any medical conditions or factors which may affect participation/performance

We will not collect all of the above types of sensitive data about you in all circumstances, We will only collect specific data when we have there is a legitimate business reason to do so for example in the following situations:

- As part of an education course / qualification registration
- When you are applying for a job with us
- If you are registered to become part of our coach educator workforce

Where we collect your information

We typically collect personal information about you through direct interactions: you may give us your personal information when you sign up for one of our products or services via our website at www.sportstructures.com or via phone, post, email, social media or otherwise. Alternatively, this may be given if you make an enquiry / complaint or when you correspond with us via phone, email or via other technological mechanisms.

If you are providing us with details of referees, next of kin, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. We would encourage you to share this Privacy Policy as appropriate.

How do we use your personal data?

We only use your personal data when allowed to do so by law. Please note that you have the right to withdraw your consent at any time by [contacting us](#) or unsubscribing to our messages.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

The table on the following page describes the main purposes for which we process your personal information. Please contact us if you would like further information about the specific basis for processing.

Activity	Personal data	Basis for processing
<p>To process and deliver a product or service that you have requested from us, including:</p> <ul style="list-style-type: none"> -Registering for a course or educational programme or purchasing a product via our website -issuing a refund -to manage the payment, fees and charges -to collect and recover money owed to us -any other contractual arrangement that we agree to enter into with you 	<p>Personal contact details, personal details, transaction and payment data</p> <p>Details of your affiliated club / organisation, identification documents, coaching history, evidence of qualifications</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests</p>
<p>To register you as a member of our workforce to deliver education programmes</p>	<p>Personal contact details, personal details and payment data</p> <p>Identification documents, coaching history, evidence of qualifications</p>	<p>This is required to ensure all workforce meet the required workforce criteria</p>
<p>To tailor our direct marketing to you and to send you direct marketing communications including via:</p> <ul style="list-style-type: none"> -Email -SMS 	<p>Personal contact and personal details</p>	<p>In terms of tailoring our direct marketing, necessary for our legitimate interests, being able to develop our business and inform our marketing and communications</p> <p>In terms of sending direct marketing where you are a customer and have not previously opted out of receiving such direct marketing, as necessary for our legitimate interests, being able to offer you relevant products and services related to what we have previously provided to you</p>
<p>To enable you to take part in prize draws, competitions or surveys</p>	<p>Personal contact and personal details</p>	<p>Performance of a contract with you</p> <p>Necessary for our legitimate interests, being able to study how customers use our products and services, to develop them and grow our business</p>
<p>To manage our relationship with you, which includes:</p>		<p>Performance of a contract with you</p>

Activity	Personal data	Basis for processing
<p>-to notify you about changes to our Privacy Policy</p> <p>-to communicate with you about changes to our product and services, websites and other services and activities from time to time</p> <p>-to respond to, deal with and address any questions, suggestions, issues or complaints you have raised</p> <p>-to respond to any social media reviews, posts or other public comments you make about us, our brands, website, services or other activities</p>		<p>Necessary to comply with a legal obligation</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</p>

Marketing to you

We may contact you by email, post or SMS with information about products and services we believe you may be interested in. We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at info@sportstructures.com. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

How we share your personal data

We cannot provide many of the services and benefits identified above without involving other people and organisations. We only share your information in accordance with the laws applicable to us and for the purposes set out in the table.

We share personal information with the following parties:

- Any party approved by you
- To national governing bodies or regional bodies for the sports offered in our products and services
- To awarding bodies or end point assessment organisations (i.e. 1st4Sport qualifications, City and Guilds)
- To other service providers: i.e. email marketing specialists, payment processors and IT services (including website, CRM)
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives
- Any funding providers or partners in a programme

How we keep your personal data secure

We take the security of your personal data very seriously and have in place appropriate security measures at all times, including where we share your information with our suppliers and partners, to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have also put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Transferring personal data internationally

We do not envisage transferring any information about or relating to anyone who is located outside of the European Economic Area. The information we collect may be transferred to organisations who may store and use such data at premises in other countries. Where we allow an organisation to process your personal information outside of the European Economic Area, any transfers made will be in full compliance with all aspects of applicable privacy and data protection law.

IP addresses and cookies

As you interact with our website and our services, we may automatically collect technical data about your equipment, browsing actions and patterns. This data about our users' browsing actions and patterns does not identify any individual.

We collect this personal data by using cookies (which is stored on the hard drive of your computer) and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website.

Retaining your personal data

We can only keep your personal data for as long as necessary and for the purposes we are collecting it for, including for the purposes of satisfying any legal, accounting, auditing or reporting requirements.

The precise length of time we hold your personal data for varies depending on the individual circumstances, but in determining the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We regularly review our retention periods to ensure that we are not keeping your data for longer than necessary. Details of retention periods for different aspects of your personal data are available by [contacting us](#).

Your rights

In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether or not a candidate has unspent criminal convictions).
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Rectification:** you may request rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Erasure:** you may request erasure of the personal data that we hold about you. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object:** you may object to how we are processing your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- **Restriction:** you may request that we restrict how we process your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase

it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Withdrawal of consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

To exercise any of these rights please contact us via the information provided on page 1. If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

The ICO regulates UK data and information laws. To learn more about your rights, visit the ICO website at www.ico.org.uk.