



AoC SPORT

PRIVACY NOTICE FOR OUR MEMBERS, COMPETING INSTITUTIONS, COMPETITORS AND VOLUNTEERS

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your involvement in AoC Sport competitions and events. This notice explains how we comply with the law on data protection and your rights.

This notice applies to you if you are either:

1. a member of staff who has registered his/her interest in entering a team in one of our competitions or attending one of our events and whose details we have collected through our online entry system, register of attendance, questionnaire or a third-party referral from a member of staff at the same institution.
2. an individual player/participant/volunteer in any of the sports offered or managed by AoC Sport who has been registered to take part and whose details we have collected through our online entry system, register of attendance, questionnaire or a third-party referral from a member of staff at the same institution.
3. A coach, technical official or referee/umpire/judge who has provided their personal details in order to be involved in any of our events.

References to **we**, **our** or **us** in this privacy notice are to AoC Sport, 2-5 Stedham Place, London WC1A 1HU and to its subsidiary ECFA

AoC Sport will be the **data controller** of your personal information.

All AoC Sport staff and Naqoda Ltd will be data processors and have signed a data agreement.

AoC have appointed a **data protection officer** (DPO) to oversee compliance with this information notice. If you have any questions about this information notice or how AoC Sport handle your personal information, please contact the DPO@aoc.co.uk

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up to be involved in any of our activities, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- o personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- o date of birth;
- o gender;
- o membership details including start and end date;
- o records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- o any personal or institution credit/debit card and other payment details you provide so that we can receive payments from you or your institution and details of the financial transactions with you or your institution;

- use of and movements through our Naqoda competition management system, online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;]
- records of your attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.

Players/Participants/Volunteers

If you are a player/participant/volunteer who has registered his/her interest in being involved in one of our activities or who has been registered to play in one of our competitions or volunteer at one of our events, you may also provide us with or we may obtain the following additional **personal information** from your institution:

- identification documents such as passport and identity cards;
- details of any club and/or representative team with whom you are involved;
- details of next of kin, coaches and emergency contacts;
- records and assessment of any player rankings, gradings or ratings, competition results;
- any disciplinary and grievance information;
- criminal records history;
- Where your institution registers you to compete in one of our competitions or events they are duty bound to make you aware of this Privacy Statement

Coaches and officials

If you have expressed an interest in being involved in any of our events you may also provide us with or we may obtain the following additional **personal information** from you:

- any coaching code or official number;
- coaching/teaching qualification and/or officiating history;
- accreditation/qualification start and end date;
- identification documents such as passport;
- endorsements or suspensions

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following **“special categories”** of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you create an account on our site at <https://www.aocsport.co.uk/> or https://aoc.naqoda.cloud/?zfaces=cmasys_home or complete any of our online surveys to enter teams or individuals into competitions or AoC Sport managed events,

provide us with feedback on events, purchase any services or products we offer online, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way. If you are a player/participant we also may collect personal information about you from your educational institution, who must make you aware of the contents of this Privacy Statement. If you are providing us with details of next of kin 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. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
All Members		
To administer any membership account(s) you have with us and managing our relationship with you, [including arranging for any insurance] and dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.
To arrange and manage any contracts for the provision of any merchandise, products and/or services.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of our services.
To send you information which is included within your membership benefits package, including details about competitions and events, partner offers and discounts and any updates.	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about Membership, events, participation products and information about our commercial partners	All contact and membership details and marketing preferences	This is covered in the terms and conditions of entering our competitions
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in

		<p>order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport and physical activity	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport and physical activity, our events and membership packages.	Images in video and/or photographic form.	As this is a legitimate interest we do not require your explicit consent to do so.
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
<u>Players/participants/volunteers</u>		
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on our representative team programme	<p>All performance and attendance data and information about your health and medical condition.</p> <p>Details of any affiliated club.</p>	<p>This is necessary to enable us to properly manage and administer your development through the representative team programme.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p>
To administer and monitor your attendance at events and competitions	All non-medical performance and attendance data.	This is necessary to enable us to register you on to and properly manage and administer you’re the event or competition that you are attending.
To arrange for transportation to and from an event	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above</p>
To use information about your physical or mental health (including any injuries) or	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your

disability status, to ensure your health and safety at any event or competition that you attend.		personal data" referred to in section 2 above. We may also need to capture this information to assess your eligibility to enter competitions and activities which are exclusively for participants with a disability.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect including any disciplinary and grievance information. This could include any information provided by national governing bodies of sport in relation to suspensions or bans	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and performance data	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
<u>Coaches and officials</u>		
To administer your attendance at any competition or event in which you are involved.	All contact details, transaction and payment data. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your involvement in the competition or event.
To conduct performance reviews, managing performance and determining performance requirements	All performance and attendance data and information about your health. Details of your current coaching/teaching qualifications and/or officiating history. Qualification start & end dates.	This is necessary to enable us to properly manage and administer your involvement in our representative team programme. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To arrange for transportation to and from an event	Identification documents, details of next of kin, family members and emergency	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.

	contacts, transaction and payment information, health and medical information.	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
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For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to permit you to engage with us or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your involvement with us. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

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. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. DIRECT MARKETING

Email, post, Twitter, Instagram, Facebook and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

You can then let us know at any time that you do not wish to receive marketing messages.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **Other service providers:** for example, payment processors, data analysis CCTV contractors and IT services (including the AoC CRM, AoC Sport website, Naqoda competition management system, FA Whole Game system, video- and teleconference services); All IT service providers act as data processors and all fully compliant with the provisions of the GDPR.
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory

requirements. Generally, where there is no legal requirement we retain all physical and electronic records until your involvement with us has ceased. Exceptions to this rule are:

- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have engaged with us.
- Where we process registration data, we will do this for as long as you are competing in our events or, for competitors and volunteers, as long as you are in attendance at the institution. It may hold your data offline for longer, though you can restrict online access to your personal data by exercising your rights as in section 9, below.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You can contact us at any time by using the details set out in the "**Contacting us**" section below.

9. YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

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.

10. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

11. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email competitions@aac.co.uk telephone us on 01935 823444 or write to us at North Street Workshops, 14 North Street, Stoke sub Hamdon, Somerset TA14 6QR