

# General Data Protection Regulation & Privacy Policy

Crawley Run Crew are committed to protecting and respecting your privacy. For any personal data you provide for the purposes of your membership, Crawley Run Crew is the Data Controller and is responsible for storing and otherwise processing that data in a fair, lawful, secure, and transparent way.

The regulation states members have 'The right to be informed' and to have rights over personal data that is held about them.

### What personal data we hold about you

You may give us information about you by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register with the Club. The information you give us may include your name, date of birth, address, e-mail address, phone number, name of the EA affiliated Clubs with which you are registered and gender (Athletics Data). We may also ask for relevant health information, or other data which is classed as special category personal data.

### Why we need your personal data

The reason we need your Athletics Data is to be able to administer your membership and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a member to provide the services you are registering for. Reasons we need to process your data include:

### For training and competitions

- sharing personal data with club coaches or officials to administer training sessions.
- sharing personal data with club team managers to enter events.
- sharing personal data with leagues, county associations (and county schools' associations) and other competition providers for entry in events.

## For funding and reporting purposes

- sharing anonymised data with a funding partner as condition of grant funding e.g., Local Authority.
- analysing anonymised data to monitor club trends; and
- sending club surveys to improve your experience as a club member.

## For membership and club management

- processing of membership forms and payments.
- sharing data with committee members to provide information about club activities, membership renewals or invitation to social events.
- club newsletter promoting club activity; and
- publishing of race and competition results.

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## Marketing and communications (where separate consent is provided)

- sending information about promotions and offers.
- sending information about club kit, merchandise, or fundraising.

Any special category health data we hold about you is only processed for the purpose of passing health data to coaches to allow the safe running of training sessions. We process this data on the lawful basis of consent. Therefore, we will also need your explicit consent to process this data, which we will ask for at the point of collecting it.

On occasion we may collect personal data from non-members. This information will be stored for 30 days and then destroyed securely. Our lawful basis for processing data is consent. Therefore, we will also need explicit consent from non-members to process this data, which we will ask for at the point of collecting it.

The club has the following social media pages; Facebook & Instagram. All members are free to join these pages. If you join one of the Social Media pages, please note that provider of the social media platform(s) has their own privacy policies and that the club do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the club social media pages.

### Where will it be processed and stored?

Spond provide the tools and controls that help implement CRC's GDPR compliant privacy policy for managing personal member data. This includes:

- What personal data is stored
- Gaining consent our form includes 'accept terms' fields that must be ticked before the form completes. Spond store the date that the application, and therefore the consent, was completed.
- Where data is stored all Spond infrastructure is hosted by Amazon Web Services (AWS) located in the EU.
- How data is protected Spond provide security and access controls for CRC member data.
- How long data is kept for CRC define how long personal data is retained and Spond automate any deletions.



Spond also assists members and administrators to exercise individual rights under GDPR.

- Right to access members can sign in to view their own personal data.
- Right to rectify members can sign in and amend their own personal data.
- Right to obtain and reuse data across different services
- Right to Erase member activity in Spond will remain visible for relevant persons after de-registered from one or more group or if you delete your Spond profile.
  When you delete your Spond-profile, your name and contact information associated to your activities will be anonymised and or removed.
- Right to restrict or object to certain processing (or withdraw consent to processing if the legal basis for the processing is consent).

Further information on the processing of personal information by Spond, and a full privacy statement can be found at <u>Privacy Policy | Spond</u>

Crawley Run Crew also store some member information (name and email) in Mailchimp for the purpose of sending member emails solely related to club and running activities. Mailchimp GDPR policies can be found at: <u>https://eepurl.com/dyikdv</u>

## How long will we keep your data?

All membership data will be held in Spond for a period of 12 months from the point a membership expires.

### Who else will see it?

The Chair, Club Secretary, Treasurer and Membership Secretary will have access to see the information on the membership forms, the selected processed data (names, emergency contact details and medical conditions) will be held by the club's coaches and run leaders. The Newsletter Editor will have access to names and email addresses.

## **England Athletics Affiliation**

When you become a member of the Club you can also choose to be registered as a member of England Athletics Limited. If you would like to register as a member of England Athletics Limited, please add this to your membership application at the point of sign up / renewal, and we will provide England Athletics Limited with your Athletics Data which they will use to enable access to the MyAthletics portal. England Athletics Limited will contact you to invite you to sign into and update your MyAthletics portal. You can set and amend your privacy settings from the MyAthletics portal. If you have any questions about the continuing privacy of your personal data when it is shared with England Athletics Limited, please contact dataprotection@englandathletics.org.



Limited data is stored outside of the UK for the purposes of using Spond and mailchimp as noted above.

### Will automated decisions be made using data?

Yes - the expiry of membership records at a point of 12 month from any membership expiry.

#### Can I withdraw my consent?

Yes, you can withdraw your consent at any time.

The regulation states every person has the right to be provided (free of charge) the personal information the club holds about them, should you wish to do this you can make a 'subject access request' to the club's membership secretary who is legally required to respond within one month of the request.

Members have the right to rectification, if a member requests that inaccurate or incomplete data is held about them be corrected, the club membership secretary has one month to make the changes (or 2 months if it's particularly complex).

#### Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data. As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us, we may not be able to register or administer your membership.

The club will ensure the accuracy of data stored by instructing all members to update their membership when membership is renewed on the 1<sup>st</sup> April each year. Any data no longer needed for the purpose it was collected will be deleted.