

## **Privacy Notice**

### **Rhythmic Excellence Gymnastics Club privacy notice – members, coaches and volunteers**

This notice applies to you if you are:

- An existing or prospective member of our club;
- A person with parental responsibility for a member;
- An existing or prospective club volunteer or official.

#### **1. About this Policy**

1.1 This policy explains when and why we collect personal information about our members and instructors, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website [rhythmicexcellence@gmail.com](mailto:rhythmicexcellence@gmail.com) or our Club noticeboard regularly for any amendments (but amendments will not be made retrospectively).

1.4 We will always comply with the General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner ([www.ico.gov.uk](http://www.ico.gov.uk)). For the purposes of the GDPR, we will be the “controller” of all personal data we hold about you.

#### **2. Who are we?**

2.1 We are Rhythmic excellence.  
We can be contacted at:

21 Munster court  
Bollo Bridge road  
W3 8UU  
London.  
E [Rhythmicexcellence@gmail.com](mailto:Rhythmicexcellence@gmail.com)  
M 079166 48566.

2.2 We provide the opportunity for our members to participate in our activities, which include recreational classes, training, camps, competitions, squads and other similar gymnastics activities.

2.3 We register with British Gymnastics who governs the sport, provides insurance for clubs and individual members and offers competitions and events. It is a condition of British Gymnastics club registration that all our club members also register as individual members of British Gymnastics.

2.4 We also affiliate to London Gymnastics Federation who runs competitions and events in which we may participate.

### 3. Information we collect about you and why.

Type of Information	Purposes	Legal Basis of Processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club. Keeping in touch with the Member (including by newsletter).	Performing the Club's contract with the Member.  For the purposes of our legitimate interests in operating the Club.
The names and ages of the Member's dependants	Managing the Member's and their dependants' membership of the Club	Performing the Club's contract with the Member.
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Date of birth / age related information	Managing membership categories which are age related	Performing the Club's contract with the Member.
Gender	Provision of adequate facilities for members.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilets) for each gender.
Medical conditions and/or disabilities and additional related information	To ensure it is safe for gymnasts to take part in gymnastics activity and to keep you/them safe while participating.	Duty of care  We will review any information provided and undertake risk assessments in consultation with gymnasts/parents and any appropriate trained professionals e.g. medical consultants.
Photos and videos of Members	Putting on the Club's website, social media pages, newsletter and using in press releases.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form and the Member may withdraw their

		consent at any time by contacting us by e-mail or letter.
Gymnast attendance and achievement records	Managing and monitoring minimum attendance required to be part of a competitive group	Performing the Club's contract with the Member.  For health and safety purposes and club records,
Trip with the club: Dietary requirements and any other relevant information that we need to know to ensure your needs are met; and Passport information if the trip is abroad	To support a participant attending a club trip  Purchasing of group tickets	For the purposes of our legitimate interests to provide support whilst away from home.
The Member's name and e-mail address	Creating and managing the Club's online Membership Directory.	Consent. We will seek the Member's consent on their membership application form and each membership renewal form. The Member may withdraw their consent at any time by contacting us by e-mail or letter to tell us that they no longer wish their details to appear in the Membership Directory.
Bank account details of the member or other person making payment to the Club	Managing the Member's and their dependants' membership of the Club, the provision of services and events.	Performing the Club's contract with the Member.
Instructor's name, address, email addresses, phone numbers and relevant qualifications and/or experience	Managing instruction at the Club.	For the purposes of our legitimate interests in ensuring that we can contact those offering instruction and provide details of instructors to members.
Name, e-mail address and telephone number of each Club Officer	Information published on Club's website, in Club's newsletter and other publications, in the Club's marketing materials and made available to the RYA, in each case as a point of contact at the Club	For the purposes of our legitimate interests in operating and promoting the Club

#### **4. How we protect your personal data**

4.1.1 We will not transfer your personal data without your consent to any third parties OR

4.1.2 In order to manage your membership of the Club and communicate with you, it may sometimes be necessary for us to transfer your personal data. However, we will only do so in accordance with the GDPR.

4.2 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction. All the above information is stored in a Google drive account protected with a access password.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

4.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

#### **5. Who else has access to the information you provide us?**

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where we are required to do so by law or as set out in the table above or in paragraph 5.2 below.

5.2 We may pass your personal data to third parties who are competition providers, event entries or document checks for the purposes of completing tasks and providing services to you on our behalf. We do this for the purpose of our legitimate interests in operating the Club and for performing our contract with you. However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

#### **6. How long do we keep your information?**

6.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.2 We securely destroy all financial information once we have used it and no longer need it.

## 7. Your rights explained

7.1 It is important that you understand what rights you have in respect of the Personal Data and that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our Data Protection Manager Stefano Sirianni [sr.stefano89@gmail.com](mailto:sr.stefano89@gmail.com).

- (a) The right to be informed (knowing how we will use your data). You have the right to be told how we will use your Personal Data – which is set out in This Notice.
- (b) The right of access (being provided with copies of your data). You have the right to ask us to provide you with a copy of your Personal Data. We will supply any information you ask for as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a data subject access request.
- (c) The right to rectification (changing incorrect information we hold). If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.
- (d) The right to be forgotten (erasure) (requesting deletion of your Personal Data). In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).
- (e) The right to restrict processing (limiting how we use your data)  
In certain situations you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.
- (f) The right to data portability (moving your data in a useable format).  
You have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations.
- (g) The right to object (when we must stop processing your data).  
You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.
- (h) The right not to be subject to automated decision making including profiling (making a decision solely by automated means without any human involvement).

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly

significantly affects you. Rhythmic Excellence club does not undertake automated decision making or profiling.

To exercise any of your rights or if you have any questions about our privacy notice please contact:

Stefano Sirianni on [sr.stefano89@gmail.com](mailto:sr.stefano89@gmail.com) or 07916648566

While we hope to be able to resolve any concerns you have about the way that we are processing your personal data, you have the right to lodge a complaint with the Information Commissioners Office (ICO) if you believe your data has been processed in a way that does not comply with the GDPR or have any wider concerns about our compliance with data protection law. You can do so by calling the ICO helpline or via their website.

<https://ico.org.uk/concerns/>  
0303 123 1113.  
Information Commissioner's Office  
Wycliffe House Water Lane  
Wilmslow  
Cheshire SK9 5AF

## **8. Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine reason to need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will contact you and the ICO of any personal data breaches in line with our legal obligations.

## **9. Changes to the privacy notice**

We keep our privacy notices under regular review. This privacy notice was published on 19/09/2018 and last updated on 06/09/21.

We may change this privacy notice from time to time, when we do we will inform you via email.