# **Nottinghamshire Orienteering Club**

## PRIVACY POLICY

We are committed to respecting your privacy. This policy explains how we use personal information we collect about any individual who has any interaction with NOC, how we comply with the General Data Protection Regulation 2018 and what your rights are.

This notice applies to you if you are an individual participant of Orienteering who has registered their interest in participating in the sport and whose details we have collected from the British Orienteering Federation or at an event organised by us. It also applies to any member of the public with whom we have a business relationship (e.g., landowners of areas that we use), suppliers of goods and services to us.

References to we, our, us or NOC in this privacy notice are to the Nottinghamshire Orienteering Club.

**BOF** refers to the **British Orienteering Federation Ltd** who are the recognised governing body for the sport in the UK. <a href="https://www.britishorienteering.org.uk">https://www.britishorienteering.org.uk</a>

EMOA refers to the East Midlands Orienteering Federation. <a href="http://www.emoa.org.uk">http://www.emoa.org.uk</a>

We have appointed a Data Controller to oversee our compliance with data protection laws as required to do so by the regulations. Contact details are set out in the "**Contacting us**" section at the end of this privacy notice. Our data processing activities do not require a Data Protection Officer to be appointed.

#### 1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up for membership with us, you will be asked to provide BOF with personal information about yourself regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses, postal address and telephone numbers
- year of birth
- gender
- membership details including start and end date
- qualifications, licences and courses attended (e.g. First Aid, Event Safety, Controller Level)

We will also collect information when you enter or attend events:

- records of your attendance at any events or competitions hosted by us and others
- location information (i.e. broadly where you were on that date, or very specifically if you provide a GPS track to RouteGadget)
- images in video and/or photographic form and voice recordings
- (optionally) next of kin contact / vehicle number plate (at certain events for safety checks)
- (optionally) medical information can be provided at each event. If required this can be in a sealed envelope for use in emergency only and destroyed at end of that event by you or us.

Other information may be collected from any interaction by physical or electronic means:

- your marketing preferences so that we know whether and how we should contact you.
- your helper team preference
- · contact details if you have asked about club kit, or requested information on the website
- contact details, and your role within an organisation with which NOC has a business relationship.
- your IP address
- payment information

## 2. WHERE WE COLLECT YOUR INFORMATION

## Explicitly – we will inform you in writing or verbally that we are collecting data and why:

We collect personal information about our members when you join us through the BOF and nominate NOC as your club.

Non-members of BOF will be asked to provide limited personal details when they attend events.

Information is also obtained from the forms on the website for "Club Kit" and for "Contact Us", and from any correspondence by email / post / telephone.

Entry processes for events, either pre-entry via Fabian4, or entry on the day (EOD). It is possible to take part in EOD events in a semi-anonymous way: your name is required for insurance purposes but would appear as say "11:31 Start", and your age would be revealed. This can only be an option at the time the event entry is made.

Post-event data provided by you electronically at the download point, and to RouteGadget by its web interface.

## Behind the scenes – we collect data without explicit consent:

Cookies: during the processing of on-line forms, cookies will be used. All such cookies will only be retained for the life of the session on the same browser on the same computer equipment. They automatically expire after 20 minutes. Users may disable cookies in their browser settings, but it may be impossible to use the forms. No other cookies are used elsewhere on the website

Webserver Logs: will automatically note which website pages are visited by browser and IP connection, the time and date, and which webpage or search query referenced the viewed page. No individual information beyond the IP address is contained in these logs, and no analysis or processing is performed on them. They may be consulted by the webmaster for improving the performance or solving reported problems of the website. It is not possible to use the website without any logs being collected, although you can use various proxy techniques to hide your IP address.

**Third Parties:** Except from the BOF membership process and any event entry processes, NOC holds no personal data obtained from any third parties, or otherwise indirectly.

## 3. 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
To administer any	All contact and membership	This is necessary to enable us to
membership you have with	details, transaction and payment	properly manage and administer
us and managing our	information, records of your	your membership contract with us.
relationship with you,	interactions with us, and	
including arranging for any	marketing preferences	
insurances		
To arrange and manage any	All contact and membership	This is necessary to enable us to
requests for the provision of	details. Transaction and	properly administer any event and
event entry, merchandise or	payment information.	perform any contract for the
products		provision of merchandise.
To send you information	All contact and membership	This is necessary to enable us to
which is included within	details	properly manage and administer
your membership benefits		your membership with us.
including event information,		
offers and discounts and		
any updates on Orienteering		
opportunities		
To send you information we	All contact and membership	Where you have given us your
think you might find useful	details and marketing	explicit consent to do so.
or which you have	preferences	
requested including		
newsletters, membership		
information, events or		
development opportunities		

To answer your queries or	Contact details and records of	We have a legitimate interest to
complaints	your interactions with us	provide complaint handling services
Complaints	your interactions with us	to you in case there are any issues
		with your membership or
Delegation of managed	All the second of the formation	participation.
Retention of records	All the personal information we	We need to retain records in order
	collect	to properly administer and manage
		your membership and in some
		cases, we may have legal or
		regulatory obligations to retain
		records.
The security of our IT	Your usage of our IT systems	We have a legitimate interest to
systems	and online portals.	ensure that our IT systems are
		secure.
To conduct data studies to	Records of your attendance at	We have a legitimate interest in
better understand event	any events or competitions	doing so to ensure that our
attendance and trends	hosted by us.	membership is targeted and
within the sport		relevant.
For the purposes of	Images in video and/or	Where you have given us your
promoting the sport, our	photographic form.	explicit consent to do so, or for
events and activities		historical images when every effort
		has been made to identify the
		subject and obtain permission
To comply with health and	Records of attendance	We have a legal obligation and a
safety requirements		legitimate interest to provide you
		and other members of our
		organisation with a safe
		environment in which to participate
		in our sport.
To administer and monitor	All non-medical performance	This is necessary to facilitate your
your attendance at events	and attendance data.	development through the
and competitions		performance programme.
To perform searches for	Information from entries and	This is necessary to ensure before
missing / overdue	safety slips	we launch a full-scale search that
competitors		the missing competitor has not
		returned (e.g. by checking with
		next-of-kin or matching an
		outstanding car) and vice-versa.
To administer access to land	Contact details	This is necessary to obtain
for events and parking, and		permissions to hold events and
provision of toilets, catering		provide event facilities.
and other traders.		

## 4. **DIRECT MARKETING**

**Email, post and SMS marketing:** from time to time, we may contact you by email, post or SMS with information about events and activities we believe may be of interest to you.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can let us know at any time that you do not wish to receive marketing messages by emailing the Club Secretary. You can also unsubscribe from our communications by clicking on the link in the messages we send to you.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may share personal information with the following parties:

- The governing body (BOF) and the regional body (EMOA) for Orienteering: to allow them to properly administer the sports on a local, regional and national level.
- Fabian4: to promote our major events and take event entries. <a href="http://www.fabian4.co.uk">http://www.fabian4.co.uk</a>
- Splitsbrowser: to provide results analysis of events <a href="http://www.splitsbrowser.org.uk">http://www.splitsbrowser.org.uk</a>
- Winsplits: to provide results analysis of events <a href="http://obasen.orientering.se/">http://obasen.orientering.se/</a>
- **MailChimp:** to provide members and other interested opted-in individuals with news and information about the club and other orienteering matters <a href="https://mailchimp.com">https://mailchimp.com</a>
- 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.
- Medical staff: when you have provided information (optionally in a sealed envelope) to be used in emergency situations only
- Police and Rescue organisations, Next-of-kin: if missing competitor search is required

Some of your personal information may be publicly available:

- The NOC club website will show event results and pictures. The personal information is limited to name, age/gender and club affiliation. Pictures will not be captioned or tagged without express permission. The RouteGadget tool is hosted directly by NOC, and will only show name, age, gender, your route and any comments you might make. We may mention individual achievements in News stories.
- The BOF website will show event results and ranking points giving your name, age, gender and club. There are tables allowing analysis of ranking details.
- The Splitsbrowser website will show an analysis of any timed NOC event you take part on, details limited to your name, age, gender and club
- Winsplits website will show an analysis of any timed NOC event you take part on, details limited to your name, age, gender and club.
- The telephone number for event organisers will be used in publicity on the NOC and BOF websites and sometimes on printed flyers.
- The telephone number and postal address for the club secretary is published on the website.
- The telephone number for the club chair is published on the website.

Within the club, information is only available to the committee, the helper team leaders, the webmaster, and event organisers, limited to the name and contact details relevant to the role. The chair, secretary, treasurer and webmaster will however have access to all data.

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

The club also has various accounts on social media including Facebook and Twitter. NOC does not pass any personal details onto social media. However, these sites might show information such as event organiser contact which have already been published on the NOC website, or the achievements of club members at events of local, national, or international level.

All post-holders appointed by the club have a role-based club email address enabling them to receive email without publishing their private personal email accounts.

Other club websites will show event publicity, results, analysis and pictures – but any information is obtained from your entry to their event, not from NOC.

## 6. 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. Event results will remain forever as a matter of record. Otherwise, where there is no legal requirement we retain all physical and electronic records for a period of four [4] years after your last contact with us.

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 may be able to update some or all of the personal information we hold about you through the BOF membership portal. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

#### 7. HOW DO WE SECURE YOUR PERSONAL INFORMATION?

Appropriate technical and administrative measures are used to prevent unauthorized access to or disclosure of any NOC data.

All databases will be encrypted and password protected if passed by email between committee members or the webmaster, and when stored on portable media or hardware.

NOC users should note that data contained in emails is not secure.

Pages of the website where personal information is entered are protected by using the HTTPS protocol.

No personal data is stored outside of the European Economic Area, however all data displayed on the website can be seen anywhere.

We will make every effort to maintain the security of data, however, in the unlikely event of a data breach by unauthorised individuals or groups we will report it to the person concerned at the earliest opportunity.

## 8. 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 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 object to certain automated decision-making processes using your personal information.

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 <a href="https://ico.org.uk/for-the-public/">https://ico.org.uk/for-the-public/</a>.

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. We may require you to produce evidence of your identity if you are aged 13 or over, or if you are the parent/guardian of a child aged 12 or under.

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.

On request, we will provide the personal information we hold about you in electronic form. However, we do not correlate or process results to match individuals and therefore will be unable to supply historical data about individual performances at specific events.

We cannot change event results except immediately after an event to correct misspelling of names. It is not possible to later change names e.g. because of marriage or divorce, nor to remove yourself from results (not least because ranking points of others is calculated from all participants).

## 9. 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.

## 10. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email <a href="mailto:gdpr@noc-uk.org">gdpr@noc-uk.org</a> or write to our appointed Data Controller at the postal address given for the club secretary on <a href="http://www.noc-uk.org/Governance/Committee">http://www.noc-uk.org/Governance/Committee</a>

Version dated 20th May 2018