

WINDRUSH TRI CLUB – PRIVACY POLICY

In order to comply with the requirements of the European General Data Protection Regulation (GDPR) for our European consumers and users, this Privacy Policy outlines the legal basis on which we process your Personal Data and provides other information required by the GDPR.

Information About Your Personal Data

This Privacy Policy relates to data about you and your interaction with our Services.

“Personal Data” is information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as your full name, email address, phone number, address, and certain cookie and network identifiers.

Windrush Triathlon Club ('the Club') collects, uses, and processes Personal Data as outlined in this Privacy Policy, to operate the Club, improve the training programme offered to our members, and for advertising and marketing.

We may create de-identified or anonymous data from Personal Data by excluding data components (such as your name, email address, or linkable tracking ID) that makes the data personally identifiable to you, through obfuscation, or through other means. Our use of anonymized and de-identified data is not subject to this Privacy Policy.

For the purposes of this Privacy Policy the term 'Member' can refer to an individual who has paid their annual fees in the current season, or have historically paid their fees but not renewed, or have signed up to participate in a trial, or have signed up for an account on the Club's NING.com website ('the Forum').

How We Collect and Use Personal Data

We collect your Personal Data in a number of ways and for various purposes, including:

- When you register for an account or interact with our websites.
- When you sign up for promotional materials.
- When you engage with our online communities or marketing material.
- When you connect with us through social media.

How We Disclose Personal Data

Unless you have given explicit consent to do so, we will not disclose your Personal Data with any third parties.

Legal Basis for Processing

For the purposes of applicable data protection laws, Windrush Triathlon Club is the controller of the Personal Data you provide to us ("Data Controller"). As a Data Controller, we process the Personal Data we maintain about you in accordance with this Privacy Policy. If you have any questions or concerns regarding the processing of your Personal Data, or if you have questions regarding this Privacy Policy, please contact info@windrushtri.co.uk

We collect and process your Personal Data for a variety of purposes outlined in this Privacy Policy. In certain cases, separate consent is not required, including:

1. Performing our core services

To perform our core services to you, including but not limited to, key information about changes to the Club or notifying all members of the AGM.

2. To meet legal obligations

To comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation.

3. For Legitimate Interests

To operate the Club, other than in performing our contractual obligations to you, except where overridden by the interests or fundamental rights and freedoms that require protection of Personal Data.

For example, the following areas include processing covered by Legitimate Interests:

- **Communication.** To communicate with you regarding the Services, including to provide you important notices regarding changes to our Terms and also to address your requests, inquiries, and complaints. We may send strictly necessary communications, including emails, even if you have opted out of receiving other Windrush Triathlon Club emails or communications. These types of communications do not require consent. We also process your Personal Data for our legitimate interests when you communicate with us.
- **Respond to Your Requests.** To respond to your requests for information or to any other communication you initiate. This includes accessing your account to address technical support requests.
- **When you engage with our online communities or advertising.** We may collect your Personal Data when you engage with our online communities. This includes re-posting data such as images or text when you click on advertisements, interact with our social media pages, submit content, leave comments or post, or otherwise enter information into comment fields, blogs, message boards, chat groups, events, and other community forums operated by or affiliated with the Club. Please note that our community forums are public, so we recommend that you exercise care in deciding what information and content you wish to disclose.

- **Compliance with Law and Public Safety.** To assist in the investigation of suspected illegal or wrongful activity. To protect and defend our rights and property, or the rights or safety of third parties.
- **Improvement and Development.** To develop, provide, enhance, and improve our Services and your experience, including to enable you to use the full range of our Services (e.g. when you connect with us through social media; when we collect data from third parties or publicly-available sources; when we aggregate and centralize data; and when we share Personal Data with our service providers and vendors). For internal purposes related to certain research, analytics, monitoring, customer communication, risk management, and administrative purposes.
- **Enforcing Terms and Notice.** To enforce our Terms or this Privacy Policy, or agreements with third parties.

Consent as a Basis for Processing

In some cases, we will ask for your consent to process your Personal Data. You may indicate your consent in a number of ways, including, as permitted by law, ticking a box (or equivalent action) to indicate your consent when (i) providing us with your Personal Data through our Services or a form; or (ii) registering or creating an account with us. We may request your consent for a number of activities including:

1. General Interest & Newsletter

We may ask for your consent to contact you about events or services that we think may be of interest to you and for other club marketing purposes. For example this could include the Newsletter, training schedule changes, coaching courses, Windrush Aquathlon, club championships, New Year's/Christmas Party.

2. Promotions & Third-Party Marketing

We may ask you for permission to use your Personal Data for special offers, third-party marketing, events, and other Promotions. We may use the Personal Data we collect during Promotions, to administer the Promotion, verify identity and age, and to communicate with you about the Promotion.

Managing Preferences and Withdrawing Consent

You may at any time withdraw your consent with future effect and without affecting the lawfulness of processing of your Personal Data based on the consent you provided before you withdrew it, and exercise other controls regarding website and online data collection, interest-based advertising, your communication settings, and app preferences. Depending on the Service, collection and use of Personal Data may be required for the Services to work.

Where is your Personal Data stored

The Club has a contract with Simmetrics Limited to use their product MyClubhouse which will be the sole repository for all member Personal Data. Simmetrics Limited is considered the Club's Data Processor and is hosted in the UK.

Simmetrics Limited Terms & Conditions can be found here: <https://myclubhouse.windrushtri.co.uk/Home/TermsAndConditions> and their Privacy Policy here: <http://www.simmetrics.co.uk/docs/PrivacyPolicy.html>

Historically the Club has used NING.com ('the Forum') & Google Drive to store Personal Data about their members.

- All Personal Data held on Google Drive has been either deleted or anonymised.
- On the Forum, Personal Data such as medical history & emergency contacts have been deleted. The only Personal Data that remains is required by the Forum to authenticate you. The Club will not use Personal Data associated with a member's Forum account for any purposes outside the authentication of their account.

How long we hold your Personal Data

We will retain your Personal Data for as long as you are a member with us, maintain an active account or as otherwise necessary to provide you the Services. An annual Activity Audit will be used to decide if a member is active or not. We will also retain your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Where we no longer need to process your Personal Data for the purposes set out in this Privacy Policy, we will delete or anonymise your Personal Data on our systems.

Activity Audit:

- Annually, starting June 1st an audit will be conducted on MyClubhouse to determine if a member is active.
- A member will be considered active if:
 - The member has logged onto MyClubhouse within the last 18 months OR
 - The member has updated their communication consents within the last 18 months
- If a member is deemed to be active, no further action will occur
- If a member is deemed to be inactive their Personal Data stored on MyClubhouse will be either deleted or anonymised
 - Any unused training tokens will be deleted and no refund awarded
- This process will only happen once a year. If during the audit, a member is near the 18 month timeframe, but not over it, they will only be re-audited and potentially deleted / anonymised the following year.

Since the Forum no longer holds Personal Data that the Club uses it will not be involved in the Activity Audit. Nor will a Forum account be automatically deleted in the event the member is found to be inactive through the above process. If a member wishes to have their Forum account removed they can follow the process set out in this Privacy Policy below.

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.

Personal Data access, rectification or erasure requests must be emailed to info@windrushtri.co.uk where it will be processed under the time line provided by GDPR.

Social Media & Communication platforms and your Personal Data

The Club has a Social Media presence on the following platforms: Facebook, Instagram & Twitter. Members can use the above process to gain access or request their Personal Data is rectified or erased.

Communication platforms such as Text messages, iMessage, Google Chat, WhatsApp & Facebook Messenger, the Club cannot process any request surrounding Personal Data because the vendor does not provide the facility. Requests must be sent to the respective vendor. If at any point you think you may require your data to be removed from these Communication platforms, the Club encourages you not to use them.