

## PRIVACY NOTICE OLD BORDENIAN HOCKEY CLUB (OBHC)

### PRIVACY NOTICE FOR OUR MEMBERS

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 membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to we, our or us in this privacy notice are to Old Bordenian Hockey Club.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Chairman and our Committee have overall responsibility for data protection compliance in our organisation. 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

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain personal information about you, such as information regarding your (note, this list is not exhaustive):

- o personal contact details that allow us to contact you directly such as name, title, email addresses and telephone numbers;
- o date of birth;
- o gender;
- o membership start and end date;
- o references and other information as part of the application process for membership;
- o records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- o any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- o use of and movements through our online portal (including our website), passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- o attendance at any events hosted by us;
- o images in video and/or photographic form and voice recordings;
- o marketing preferences so that we know whether and how we should contact you;
- o identification documents such as passport and identity cards;
- o details of any county membership and previous club;
- o details of next of kin, family members, coaches and emergency contacts;
- o records and assessment competition results, details regarding games and training attended and performance (including statistics and that generated through Player Pathway programme);
- o disciplinary and grievance information;
- o kit information (including squad number and clothing sizes);
- o dietary requirements;
- o umpiring and coaching qualifications; and

o committee position.

## **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

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

- o information about your race or ethnicity, religious beliefs and sexual orientation;
- o information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- o biometric information about you, for example fingerprints, retina scans.

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:

- o the processing is necessary for reasons of substantial public interest, on a lawful basis;
- o it is necessary for the establishment, exercise or defence of legal claims;
- o 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
- o 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 about 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 apply to become a member of the club, you register an account with us at [www.obhc.co.uk](http://www.obhc.co.uk), when you purchase any services or products we offer (including kit), when you make a query and/or complaint or when you correspond with us by phone, e-mail, WhatsApp, social media or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for membership.

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how 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. This table is not exhaustive.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including 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.
To send you information which is included within your membership, including newsletters, details about ticket information, competitions and events (including socials), courses, products, partner offers and discounts and any updates on hockey	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership.
To send you other marketing information we think you might find useful or which you have requested from us, including information about our commercial partners	Contact details and marketing preferences.	Where you have given us your explicit consent to do so
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 order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records. 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 criminal records history we process it on the basis of legal obligations or based on your explicit consent.
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	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 club, our events and membership packages	Images in video and/or photographic form.	We have a legitimate interest in doing so to ensure that we attract new members and/or promote our events

To comply with health and safety requirements	Records of attendance, medical information about your health	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. 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 administer your attendance at any courses or programmes you sign up to (including umpiring courses)	All contact and membership details, transaction and payment data.	This is necessary to enable us to register you on to and properly manage and administer your attendance at, the course and/or programme.
To arrange for any trip or 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	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. 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 use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.	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.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect	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 criminal records history we process it on the basis of legal obligations or based on your explicit consent.
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity and health and medical information	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.
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.

For match days	All contact and membership details and dietary information	This is necessary to enable us to properly manage and administer your membership.
For kit orders	All contact and membership details, kit sizes	Where you have given us your explicit consent to do so

You may have a legal, contractual or other requirement or obligation to provide us with some of your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member 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 membership. 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 relationship 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, WhatsApp, social media and SMS marketing: from time to time, we may contact you by email, post, WhatsApp, social media or SMS with information about products and services (including social events) we believe you may be interested in. You can let us know at any time that you do not wish to receive marketing messages by contacting us as described in the "Contacting us" section below.

## 6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties (note, this list is not exhaustive):

- o Any party approved by you.
- o Hockey governing bodies or regional bodies: (i) to allow them to properly administer hockey on a local, regional and national level; and (ii) in respect of any welfare or safeguarding issues for vulnerable adults within the club;
- o Opposition teams: where we need to share information to arrange and organise matches (including dietary information for match teas);
- o Other members: to administer your membership;
- o Service providers, when necessary: for example, payment processors, suppliers;
- o Supply chain partners: such as couriers, kit suppliers;
- o Commercial partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership package;
- o The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives; and
- o Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

## 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 for a period of 6 years after the later of your last contact with us or the end of your membership. Exceptions to this rule are:

- o Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
  - o Information that may be relevant to personal injury 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 the event.
- 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 of the personal information we hold about you through our website, WhatsApp or social media. Alternatively, you can contact us 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:

- o the right to be informed about how your personal information is being used;
- o the right to access the personal information we hold about you;
- o the right to request the correction of inaccurate personal information we hold about you;
- o the right to request the erasure of your personal information in certain limited circumstances;
- o the right to restrict processing of your personal information where certain requirements are met;
- o the right to object to the processing of your personal information;
- o the right to request that we transfer elements of your data either to you or another service provider; and
- o 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, or to contact us to update your personal information, please email [info@obhc.co.uk](mailto:info@obhc.co.uk).

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