



ALL ENGLAND NETBALL ASSOCIATION (ENGLAND NETBALL)

PRIVACY NOTICE

FOR INDIVIDUALS NOT COVERED BY A SPECIFIC PRIVACY NOTICE

This notice applies to you if we process your personal information and to whom we have not provided a specific privacy notice. This is where you are not an employee, director or worker of ours, a prospective candidate employee, director or worker or a member, player, participant, coach/official, customer or volunteer. You may, for example, be an individual that works at a supplier or customer of ours or another organisation that we deal with, a user of our website or someone who is affected by any of our activities.

In this privacy notice, whenever you see the words 'we', 'us' or 'our', it refers to the All England Netball Association – more commonly known as England Netball (Company no: 01698144). We are the national body responsible for Netball delivery in England. Our registered offices are SportPark, 3 Oakwood Drive, Loughborough, LE11 3QF. England Netball is the controller of all personal data processed by England Netball.

England Netball is not required to have a Data Protection Officer, but our Data Protection Lead has 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.

We are committed to protecting and respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us. This notice explains how we comply with the law on data protection and what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

PERSONAL INFORMATION WE COLLECT

We may collect the following types of personal information about you:

- **Contact details:** information that allows us to identify and contact you directly such as your name, email address, telephone number and addresses.
- **Identification information:** passport and other official identification details, information from a third party money laundering check provider, Companies House information, national insurance number.
- **Details of your work history:** This may include positions, roles, responsibilities, professional qualifications.
- **Personal history and information:** This includes hobbies, interests, marital status, family details and dietary requirements.
- **Advisors appointed by you:** including lawyers, financial advisors.
- **Business information:** including transactions, amounts paid or owed.
- **Responses to surveys, competitions and promotions:** we keep records of any surveys you respond to or your entry into any competition or promotion we run.
- **Creditworthiness:** We may undertake investigations into your creditworthiness in order to establish whether to enter into or continue a business relationship with you.
- **Records of your attendance:** at any events or competitions hosted by us or jointly with third parties.
- **Details of your performance:** when working with or for us or in relation to any project or work we are engaged in.
- **How you use our website:** we collect information about the pages you look at and how you use them, usernames and passwords.
- **Videos, photographs and audio recordings:** which you or other people take and provide to us or we take ourselves.
- **Details of the correspondence (including e-mail correspondence) you send and receive from us and details of any claims:** this includes letters and emails, SMS, MMS and other

electronic communication and may in some cases include audio recording of telephone conversations.

- **Subscription information:** for example when you subscribe to one of our newsletters or other materials.
- **IP address information:** your computer's IP address allows us to track your usage of our website.

SPECIAL CATEGORIES OF PERSONAL INFORMATION

We do not generally collect, store and use the following “special categories” of more sensitive personal information regarding you:

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

If we do collect any special category personal information, we do not currently rely on consent as a basis for processing special category personal information.

We will also not collect, store and use any criminal records information in relation to you. If we do collect any criminal records information, we do not currently rely on consent as a basis for processing criminal records information.

SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM

We will collect personal information from a number of sources. These may include the following:

- **Directly from you:** when you complete forms we provide to you, respond to a survey, use our website, enter our competitions and promotions, make a claim, make a complaint or communicate with us directly in some other way.
- **From referrals and recommendations:** usually given by other people who know you or have a working relationship with you.
- **Our website:** provides us with information about how you use it and the devices that you use to connect to our website.
- **Providers of information:** which may include professional bodies, credit reference agencies, Companies House, the Land Registry, LinkedIn and other web platforms].
- **Journalists or other investigators:** they may provide us with details or make enquiries about you or matters concerning you or ourselves.
- **Your employer or the organisation you work for:** they may provide us with your name, position contact details and background information about you.
- **Our professional advisors:** such as lawyers, accountants and other consultants and advisors.
- **Any other governing bodies, regional and county bodies, leagues or clubs:** to allow us to properly administer Netball on a local, regional and national level.

WHAT WE USE YOUR PERSONAL INFORMATION FOR

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. The purposes which will apply will depend upon the nature of your relationship and interactions with us.

Purpose	Personal information used	Lawful basis
Identity and money laundering checks and passing details of our money laundering checks to third parties and to carry out credit checks	All the personal information we collect	We may have a legal obligation to undertake identification and money laundering checks and to provide those details to third parties We and a third party also have a legitimate interest in knowing your identity and carrying out money laundering checks and ensuring that we are likely to be paid
To enter into and perform contracts, where we may be supplying products/ services to you and/or you may be supplying products/services to us or we may be involved in similar arrangements with third parties	All the personal information we collect	To enter into and perform contracts with either yourself or the organisation that you represent We have a legitimate interest to properly perform contracts with third parties
Deal with your queries or complaints, claims, legal disputes or raise queries, claims, legal disputes or complaints with you	All the personal information we collect	This may be necessary to perform a contract with you or the organisation that you represent We have a legitimate interest to improve the services and/or products we provide To defend, bring or establish legal claims
Maintain and improve our services and/or products	All the personal information we collect	We have a legitimate interest to improve the services and/or products we provide
Data analytics and statistical analysis to help us improve our online services	How you use our website	We have a legitimate interest to improve the online services we provide and user experience
Determine services and/or products that may be of interest to you	All personal information we collect	We have a legitimate interest to improve the services and/or products we provide and to determine which products and/or services you may be interested in
To provide you with requested information	Contact details and services and products or other information that you have requested we provide to you or your organisation	To comply with any request made by you
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your consent to do so.

Direct marketing	Contact details and services and products that we have determined may be of interest to you or your organisation and/or which you or your organisation has purchased in the past	We may ask for your consent to process your data for this purpose, you may revoke your consent at any point. Alternatively if you or your organisation has purchased similar services or products from us previously we may market similar products or services as a legitimate interest in developing our organisation. You have the right to opt out from such marketing at any time
Holding any meetings or events	Your contact details, details of attendance, your comments in response to any surveys or forms and dietary requirements	We have a legitimate interest in holding meetings and events and tracking attendance and providing appropriate food and drinks at meetings and events We may also have a legal obligation to comply with health and safety requirements
To comply with our legal and regulatory obligations	All the personal information we collect	To comply with any legal and regulatory obligation or requirement
Fraud, crime prevention and debt collection	All the personal information we collect	We have a legitimate interest to detect and prevent crime and to collect debts.
To manage our relationship with you and to operate our organisation	All the personal information we collect	We have a legitimate interest to operate our organisation in an efficient way and to expand our organisation To enter into and perform contracts with either yourself or the organisation that you represent
Storage of records relating to you and also records relating to our organisation	All the personal information we collect	To be able to manage and fulfil any contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records

For some of your personal information there may be a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to properly perform our contract with you or the organisation you represent or comply with legal obligations and we may have to terminate our relationship. 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 arrangements with you or the organisation you represent.

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. We will generally only ask for your consent for direct marketing.

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 marketing information to you.

We may anonymise and aggregate any of the personal information we hold (so that it does not directly identify you). We may use anonymised and aggregated information for purposes that include testing our IT systems, research, data analysis, improving our site and developing new products and services.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share personal information with the following parties:

- **Any party approved by you.**
- **Companies in our supply chain:** so that they can contact you about any issues in the supply chain or where your personal information is relevant to a subcontractor or party above us in the supply chain.
- **Credit reference and other identification agencies:** so that we can assess your creditworthiness and to verify your identity. These agencies may retain a footprint that a search has been undertaken.
- **Third parties who ask for or want referrals:** we may provide your details to a third party who is seeking services/products which are the same or similar to those that you provide.
- **Marketing and public relations companies:** to help us to develop, carry out and assess marketing and PR campaigns.
- **Other service providers and advisors to us:** such as companies that support our IT, help us analyse the data we hold, organise events for us, process payments, send communications to our customers, provide us with legal, property or financial advice and generally help us deliver our products and services to you or the organisation that you represent or for us to purchase them from you or the organisation you represent.
- **Information providers:** which may include credit reference agencies, money laundering check providers, Companies House, the Land Registry.
- **Purchasers of our organisation:** buyers or perspective buyers to whom we sell or negotiate to sell our organisation.
- **To any governing bodies, regional and county bodies, leagues or clubs:** to allow them to properly administer Netball on a local, regional and national level or in relation to joint events.
- **Police, law enforcement agencies and security services:** to assist with the investigation and prevention of crime and the protection of national security.

We also use Google Analytics which sets cookies to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. To opt out of being tracked by Google Analytics across all websites visit <http://tools.google.com/dlpage/gaoptout>.

We may provide third parties with aggregate statistical information and analytics about users of our products and services but we will make sure no one can be identified from this information before we disclose it.

We do not disclose personal information to anyone else except as set out above unless we have your consent or we are legally obliged to do so. We do not sell your data.

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 or other legitimate reason to keep your information longer we retain relevant physical and electronic records for a period of up to 6 years after your last contact with us.

Exceptions to this rule are:

- Information that may be relevant to personal injury claims, 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 you have been involved with us.

The personal information retained will be minimised to the information required for the purposes for which it is retained. Full details of our retention periods, what personal information is retained and our justification for doing this can be found in our data retention schedule.

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 move position or work for a different organisation or change your phone number or email address. You can contact us by using the details set out in the “**Contacting us**” section below.

USING YOUR INFORMATION FOR MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products or services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set when you either create your account or establish a relationship with us, that you tell us you are happy to receive or where you or the organisation you represent have purchased similar services or goods from us previously.

You can then let us know at any time that you do not wish to receive marketing messages by sending an email to us by using the details set out in the “**Contacting us**” section below. You can also unsubscribe from our marketing by clicking on the unsubscribe link in any marketing messages we send to you.

CHILDREN

Children’s data are collected and processed in accordance with the information in this privacy notice. Parents and guardians are expected to ensure that the children they are responsible for are aware of how their personal data will be processed by us.

We require parental or guardian consent to process personal data of any child under the age of 14.

TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction where you are resident. We will take all reasonable steps to ensure that your personal information is used only in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws.

International organisations we work with include:

SNAP Surveys is used to facilitate the sending of surveys. Snap WebHost runs on Rackspace UK servers, and data are held on servers in the UK. This is accessible by Snap Surveys staff based in both the UK and the US. Snap US subsidiary is certified under the EU-US and Swiss-US Privacy Shield which is approved by the EU in relation to data protection practices. In rare technical support circumstances and to provide 24/7 cover, support agents working for Rackspace who are based outside of the European Economic Area may access the servers. They have included EU Model Clauses in their contract with Rackspace to apply their protections to any potential transfers of personal data in those circumstances.

Dropbox is a secure online file sharing and storage platform. It may store, process and transmit information in the United States and locations around the world. Information may also be stored locally on the devices used to access the Services. Dropbox complies with the EU-US and Swiss-US Privacy Shield which is approved by the EU in relation to data protection practices. Their registration can be reviewed on the Privacy Shield website www.privacyshield.gov/list.

SurveyMonkey is used to facilitate the sending of surveys. SurveyMonkey subscribes to the EU-US Privacy Shield which is approved by the EU in relation to data protection practices. Their registration can be reviewed on the Privacy Shield website www.privacyshield.gov/list.

Google Cloud Platform is used for Google Docs. Google Cloud Platform subscribes to the EU-US Privacy Shield which is approved by the EU in relation to data protection practices. Their registration can be reviewed on the Privacy Shield website www.privacyshield.gov/list.

INFORMATION SECURITY

We do our very best to keep personal information secure wherever we collect personal data. We place a great importance on the security of all personally identifiable information. We will take all steps reasonably necessary including policies, procedures and security features to ensure that information about you is treated securely and protected from unauthorised and unlawful access and used in accordance with this privacy notice. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control or being transferred, we use our best efforts to try to prevent this.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

WHAT WE DON'T DO WITH YOUR INFORMATION

We never sell or share your information with other organisations to use for their own purposes.

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 limited 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 request that we transfer elements of your data either to you or another service provider; and
- 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.

The All England Netball Association is not a ‘public authority’ as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act.

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.

CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email our Data Protection Lead: dataprotection@englandnetball.co.uk, telephone 01509 277850 or write to England Netball, SportPark, 3 Oakwood Drive, Loughborough, Leicestershire, LE11 3QF.

Version dated 27 May 2019