



MAIDSTONE WARRIORS BASKETBALL CLUB

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 Maidstone Warriors Basketball Club, including its governing Committee and appointed Coaches, Team Managers and other appointed volunteers. References to **you**, **your** or **yours** are to an actual or prospective member of the Club, including membership applications submitted by parents, guardians or carers on behalf of children.

We have appointed a Data Protection Officer to oversee our compliance with data protection laws. 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

In registering for membership or in a volunteer capacity with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership start and end date;
- references and other information included in a CV or cover letter or as part of the application process for volunteer status;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- 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;
- use of and movements through our website at www.maidstonewarriors.co.uk, including the use of cookies and capturing of IP addresses;
- records of your attendance at any events hosted by us;
- information obtained through electronic means, such as the scanning of your membership card;
- images in video and/or photographic form and voice recordings;
- your marketing preferences so that we know whether and how we should contact you.
- identification documents such as passport and identity cards;
- details of any county / regional membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, grading or ratings, competition results, details regarding events / matches / tournaments attended and performance (including that generated through any player pathway programmes); and
- any disciplinary and grievance information.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- 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.



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 :-

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- 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
- 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 <https://membermojo.co.uk/maidstonewarriors>, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also collect information on the payment of registration fees, subscriptions (**subs**) and other goods and services provided by the Club (such as the provision of kit) from GoCardless, a third party direct debit payment provider which you are required to register with separately at <https://pay.gocardless.com/AL00006NN1TMH6>. Such information includes your name, email and home address, name of bank, the last two digits of (and never the entire) account number from which payment is being made, along with the amounts and dates of such payments. A copy of the privacy notice issued by GoCardless (an Authorised Payment Institution regulated by the UK Financial Conduct Authority) can be found here <https://gocardless.com/legal/privacy/>

We also collect information about you when you subscribe to our mailing list. We may use a third party provider, MailChimp, to deliver our email communications / e-newsletters (see also 7. below). We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see MailChimp’s privacy notice at <https://mailchimp.com/legal/privacy/>.

Our appointed Coaches and Team Managers may also collect personal information about our members, subject to this data being held in a secure cloud environment. Such data may be processed via third party platforms for the purposes of communicating information (such as game fixtures) to players. In this event, your consent will be sought and you will have access to such parties’ privacy policies.

The Club also utilises certain social media / networking platforms, your subscription to which is on an entirely voluntary basis, with the respective third party provider’s privacy policies applying in their capacity as controllers of your personal data.

We may also collect personal information about you from any third party references you provide as part of an application for a volunteer role.

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:

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you,	All contact and membership details, transaction and payment	This is necessary to enable us to properly manage and administer your membership with us.



Purpose	Personal information used	Lawful basis
including dealing with payments and any support, service or product enquiries made by you	information, records of your interactions with us, and marketing preferences.	
To arrange and manage the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform the provision of any services and products you have purchased from us.
To provide limited information with other stakeholders in basketball, such as other clubs, associations, league organisers	Membership details.	This is necessary to enable other clubs, associations and league organisers to maintain appropriate records and assist us in organising matches and administering the game.
To send you information which is included within your membership benefits package, including details about advanced ticket information, competitions and events, partner offers and discounts and any updates on Basketball England or its affiliated bodies or associations.	Contact and membership details.	This is necessary to enable us to properly manage and administer your membership with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, products and information about any commercial partners	Contact details and marketing preferences.	This is necessary to enable us to properly manage and administer your membership with us. Where you have given us your explicit consent to do so for any direct marketing that is not included as part of our membership package.
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



Purpose	Personal information used	Lawful basis
		<p>section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>The security of our IT systems</p>	<p>Your usage of our IT systems and online portals.</p>	<p>We have a legitimate interest to ensure that our IT systems are secure.</p>
<p>To conduct data analytics studies to better understand event attendance and trends within the sport</p>	<p>Records of your attendance at any events, games or competitions hosted by us.</p>	<p>We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.</p>
<p>For the purposes of promoting the club, our events and membership packages.</p>	<p>Images in video and/or photographic form.</p>	<p>Where you have given us your explicit consent to do so.</p>
<p>To comply with health and safety requirements</p>	<p>Records of attendance and other information obtained through electronic means such as scans of membership cards and medical information about your health.</p>	<p>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.</p> <p>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.</p>
<p>To administer your attendance at any courses or programmes you sign up to</p>	<p>All contact and membership details, transaction and payment data.</p> <p>Details of any county / regional membership and performance data.</p>	<p>This is necessary to enable us to register you onto and properly manage and administer your attendance on the course and/or programme.</p>
<p>To arrange for any trip or transportation to and from an event (please note: it is currently <u>not</u> the Club’s policy to facilitate these arrangements)</p>	<p>Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event.</p> <p>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.</p>



Purpose	Personal information used	Lawful basis
<p>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.</p>	<p>Health and medical information</p>	<p>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.</p>
<p>To gather evidence for possible grievance or disciplinary hearings</p>	<p>All the personal information we collect</p>	<p>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.</p> <p>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.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p>For the purposes of equal opportunities monitoring</p>	<p>Name, title, date of birth gender, information about your race or ethnicity and health and medical information</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>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.</p>
<p>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</p>	<p>Information about your criminal convictions and offences</p>	<p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

For some of your personal information you will have 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 admit you as a member or we may not be able to properly perform our services to 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 services to 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 and SMS marketing: from time to time, we may contact you by email, post or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by emailing dpo.maidstonewarriors@membermojo.co.uk. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies or regional bodies (principally Basketball England and the Medway Basketball Association) for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level. Basketball England provides an online database, but make its own use of the following information:
 - your name;
 - your gender;
 - your date of birth;
 - your Basketball England license number
 - your home address, email address and phone number; and
 - your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

Basketball England uses this information to conduct its business and pursue its legitimate interests, in particular:

- communicating with you or about you where necessary to administer basketball in England;
- administering and ensuring the eligibility of players, match officials and others involved in English basketball – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
- maintaining records of the game as played in England, in particular maintaining details of discipline, misconduct and safeguarding cases;
- maintaining statistics and conducting analysis on the make-up of basketball's participants;
- ensuring compliance with the current Basketball England Rules and Regulations including those on the affiliation of clubs, local leagues, associations and other basketball bodies, and registration of players; and
- communicating with you to ask for your opinion on Basketball England initiatives.

Further information can be found in Basketball England's data protection policy at <https://www.basketballengland.co.uk/about/policies-procedures/data-protection/data-protection-contents/data-protection/>

- **Other service providers:** for example, email marketing specialists, payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including CRM, website, video and teleconference services);



- Our supply chain partners and sub-contractors, such as kit suppliers, couriers, import/export agents, shippers;
- **Our 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 where you have given your express for us to do so;
- **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.

7. 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 Economic Area (EEA). 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 you are typically resident in. If we do transfer information to our agents or advisers outside of the EEA, we will make sure that it is protected in the same way as if it was being used in the EEA. We will use one of these safeguards:

- Transfer it to a non-EEA country with privacy laws that give the same protection as the EEA. Learn more on the European Commission Justice website (see https://ec.europa.eu/info/law/law-topic/data-protection_en)
- Put in place a contract with the recipient that means they must protect it to the same standards as the EEA.
- Transfer it to organisations that are part of Privacy Shield (see www.privacyshield.gov/welcome). This is a framework that sets privacy standards for data sent between the US and EU countries. It makes sure those standards are similar to what is used within the EEA. An example of an active participant in Privacy Shield is MailChimp, which we may utilise for our email communications (see also 3. above).

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 six years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- 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 membership portal. 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:

- 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.

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, please email dpo.maidstonewarriors@membermojo.co.uk in the first instance or write to us at: the Data Protection Officer, Maidstone Warriors Basketball Club, 29 Cornwallis Avenue, Linton, Maidstone ME17 4BW.

Version dated 24th May 2018