

## LOUGHBOROUGH ACROBATICS GYMNASTICS CLUB (CIO)

### DATA PROTECTION & PRIVACY POLICY

The General Data Protection Regulations cover all aspects of the use of personal data.

#### Who are we?

Loughborough Acrobatics Gymnastics Club is a charitable incorporated organisation, Charity number: 1161552. Our address is Unit 8 & 9 Weldon Road Industrial Estate, Loughborough, LE11 5RN

We are the “data controller” for the purposes of GDPR. This means that we decide how your Personal Data is processed and for what purposes.

#### Your personal data – what is it?

Personal Data is data that relates to a living individual who can be identified from that data. We might be able to identify you from the data itself or by linking that data to other information we have access to. GDPR tells us how we must process your Personal Data.

#### How do we process your Personal Data?

We comply with our obligations under GDPR in the following ways:

- by keeping Personal Data up to date;
- by storing and destroying it securely;
- by not collecting or retaining unnecessary or excessive amounts of data;
- by protecting Personal Data from loss, misuse, unauthorised access and disclosure; and
- by ensuring that appropriate technical measures are in place to protect Personal Data.

## 1. Introduction

1.1 We are committed to safeguarding the privacy of our members; in this policy we explain how we will treat your personal information.

## 2. Collecting personal information

We may collect store personal information using a third-party company programme called COACHA. Information around their privacy policy can be found following this link: [Coacha privacy](#)

We collect the following kinds of personal information when you choose to sign up to our waiting lists or enrol on one of our courses or when becoming a full club member:

(a) information that you provide to us when registering with our waiting lists or membership programmes (including, name, DOB and email address);



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(b) Sensitive personal data such as medical information important so that we are able to effectively deal with medical emergencies and tailor sessions to the needs of the individual member

(c) information relating to any services or any other transactions that you enter into through our membership system (including your name, address, telephone number, email address and card details);

(d) information that you post to our social media platforms for publication on the internet (including your profile name, your profile pictures and the content of your posts);

(e) information contained in or relating to any communication that you send to us or send through our website.

(f) any other personal information that you choose to send to us.

2.2 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

### 3. Using personal information

3.1 Personal information submitted to us through our membership system will be used for the purposes specified in this policy or on the relevant pages of the website.

3.2 We may use your personal information to:

(a) administer our membership system and payments;

(b) enable your use of the services available on our website or membership system;

(c) supply to you, services purchased through our website or membership page;

(d) send statements, invoices, and payment reminders to you, and collect payments from you;

(e) send you email notifications about term dates, gymnastics opportunities or related service and competition information;

(f) send you our email newsletter, (you can inform us at any time if you no longer require the newsletter);

(g) deal with enquiries and complaints made by or about you relating to our website or membership system;

(h) entering members into competitions and events.

(i) dealing with illness and medical emergencies effectively and



3.3 If you submit personal information for publication on our website, we will publish and otherwise use that information in accordance with the license you grant to us.

3.4 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing.

3.5 All our website financial transactions are handled through our payment services provider, GoCardless. Their privacy policy can be found here: [Privacy Centre | GoCardless](#)

We will share information with our payment services provider only to the extent necessary for the purposes of processing payments you make via our website, refunding such payments and dealing with complaints and queries relating to such payments and refunds.

#### 4. Disclosing personal information

4.1 We may disclose your personal information to any of our employees, officers, insurers, professional advisers, or agents insofar as reasonably necessary for the purposes set out in this policy.

4.2 We may disclose your personal information:

- (a) to the extent that we are required to do so by law;
- (b) in connection with any ongoing or prospective legal proceedings;
- (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);

4.4 Except as provided in this policy, we will not provide your personal information to third parties.

#### 5. Retaining personal information

5.1 This Section 5 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.

5.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for the intended purpose, in most cases we will destroy personal data within 12 months of membership ceasing.

5.3 Notwithstanding the other provisions of this Section 5, we will retain documents (including electronic documents) containing personal data:

- (a) to the extent that we are required to do so by law;
- (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and



(c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## 6. Security of personal information

6.1 We will take reasonable technical and organisational precautions to prevent the loss, misuse or alteration of your personal information.

6.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.

6.3 All electronic financial transactions entered into through our website will be protected by encryption technology through our third party provider.

6.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.

6.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password.

## 7. Amendments

7.1 We may update this policy from time to time by publishing a new version on our website.

7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

7.3 We may notify you of changes to this policy [by email or letter]

## 8. Your rights

8.1 You may instruct us to provide you with any personal information we hold about you; provision of such information will be subject to:

(a) the payment of a fee (currently fixed at GBP 10); and

(b) the supply of appropriate evidence of your identity (for this purpose, we will usually accept a photocopy of your passport certified by a solicitor or bank plus an original copy of a utility bill showing your current address).

8.2 We may withhold personal information that you request to the extent permitted by law.

8.3 You may instruct us at any time not to process your personal information for marketing purposes.

8.4 In practice, you will usually either expressly agree in advance to our use of your personal information for marketing purposes, or we will provide you with an opportunity to opt out of the use of your personal information for marketing purposes.



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## 9. Third party websites

9.1 Our website includes hyperlinks to, and details of, third party websites.

9.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 10. Updating information

10.1 Please let us know if the personal information that we hold about you needs to be corrected or updated.

## CCTV Policy and data compliance

### 1. Introduction

This CCTV Policy is established to ensure the lawful, fair, and transparent processing of personal data through the use of closed-circuit television (CCTV) cameras installed inside the Loughborough Acrobatics Gymnastics Club CIO (hereinafter referred to as "the Charity"). This policy outlines the Charities commitment to complying with the General Data Protection Regulation (GDPR) and protecting the privacy and rights of individuals whose personal data may be captured by CCTV cameras.

### 2. Scope

This policy applies to all CCTV cameras installed within the premises of the Charity, including any associated recording and monitoring systems. It applies to all Charity members, employees, volunteers, visitors, and any other individuals whose personal data may be processed through CCTV surveillance.

### 3. Ownership and control

Loughborough Acrobatics Gymnastics Club is the Data Controller/owner. The charities appointed trustees are the only persons responsible for the processing of personal data captured by CCTV cameras.

The CCTV system, as well as all recorded material are owned by the Charity.

### 4. Purpose of CCTV Surveillance

CCTV cameras are installed at the charity for the following purposes:

- a. Ensuring the safety and security of charity members and employees.
- b. To help detect or prevent crime. Reducing the chances of theft, misuse, vandalism, and unauthorised access to the charities facilities and equipment.
- c. Monitoring and enhancing the safety of individuals during gymnastics and other related activities.



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- d. To allow parents/carers to view their child participating during their classes.
- e. Assisting in the investigation of accidents, incidents, and emergencies that may occur within on the premises.
- f. To assist in the effective resolution of disputes which arise during disciplinary or grievance proceedings.
- g. To identify unauthorised actions or unsafe working and training practices that might result in disciplinary proceedings being initiated against employees or volunteers and to assist in providing relevant evidence.
- i. To help identify any activities/coaching practices which might warrant disciplinary proceedings against members, staff, and any other visitors or users of the facility.
- j. To assist in the defence of any civil litigation, including employment tribunal proceedings.
- k. Provide evidence to appropriate people who may be involved in any investigations around accidents, incidents, miss use of equipment, vandalism, theft or unauthorised access.

### 5. Data Collected

The CCTV system may capture the following types of personal data:

- a. Images and recordings of individuals.
- b. Timestamps and location data.
- C. Live feeds during sessions

### 7. Data Retention

Recordings captured by CCTV cameras will be retained for a period of 30 days, unless a specific incident or investigation requires a longer retention period. After the retention period, recordings will be securely erased or overwritten.

### 8. Data Access and Disclosure

Access to CCTV footage will be restricted to authorised personnel, including the Data Controller, and individuals responsible for the security and safety of the premises. The charity may disclose CCTV footage to law enforcement agencies, legal authorities, or other authorised parties when required by law or investigations related to the premises.

### 9. Data Security

The charity will take appropriate technical and organisational measures to ensure the security of the data captured by CCTV cameras. This includes access control, and regular system maintenance to prevent unauthorised access, disclosure, alteration, or destruction of data.

### 10. Rights of Data Subjects



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10.1 Under the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that the Charity holds about them, including CCTV images if they are recognisable from the image. Contact: [info@lagc.org.uk](mailto:info@lagc.org.uk).

10.2 If the Club is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, as well as impacting on the privacy of others you will be advised accordingly.

## 11. Review and Compliance

This CCTV Policy will be regularly reviewed and updated to ensure ongoing compliance with GDPR and any other relevant data protection regulations.

This policy is effective as of 22<sup>nd</sup> January 2022 and is subject to regular review.

*R Ford*

Trustee

Loughborough Acrobatics Gymnastics Club

22<sup>nd</sup> January 2022