***OCTAVIAN DROOBERS ORIETNEERING CLUB***

**PRIVACY NOTICE FOR NON-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 relationship with us a volunteer. This notice applies to current and former volunteers and this notice is not a contract of employment or other contract to provide services. 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 ***the OCTAVIAN DROOBERS ORIETNEERING 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 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.

1. Personal Information

When you sign up to take part in an event organised by US, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

* + personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
	+ date of birth;
	+ gender;
	+ details of family members and emergency contacts;
	+ records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
	+ records of your entry history;
	+ any identification documents;
	+ all information included as part of the event participation process;
	+ performance including any feedback provided to us by yourself, members of staff or other third parties;
	+ movements though CCTV footage and other information obtained through electronic means;
	+ use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
	+ images in video and/or photographic form and voice recordings;
	+ your marketing preferences so that we know whether and how we should contact you;
	+ *[any other personal information*?]
1. **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 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 to provide safe assistance to you at the event;
	+ 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”.

1. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our event participants through the entry process, either directly from you, or sometimes from a third-party agency such as British Orienteering or Fabian4. We will also collect additional personal information if you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way

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.

1. Uses made of YOUR PERSONAL 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*** |
| **Non- ‘special categories’ of Personal Information** |
| **Managing your participation in the event** | All the personal information we collect from you as part of the entry process.Records of entry. Records of membership of British Orienteering or other clubs.  | We need this information to be able to manage the event you are entering. |
| **To produce and maintain our website and any external marketing campaigns in order to promote orienteering** | Images in video and/or photographic form and voice recordings | Where you have given us your consent to do so.  |
| **Complying with health and safety obligations** | Movements though CCTV footage & other information obtained through electronic means such as swipecard and key fob records.Using special category medical information in providing assistance and first aid to you. | We have a legal obligation to comply with Health and Safety laws. |
| **Dealing with legal disputes involving you including accidents**  | All non-‘special categories’ of personal information | We have a legitimate business interest to ensure that all legal claims are managed effectively.We also have a legal obligation to report any accidents in accordance with health and safety laws. |
| **Storage of records relating to you**  | All non-‘special categories’ of personal information | We need this information to be able to fulfil our contract with you. |
| **To send you information we think you might find useful or which you have requested from us, including our newsletters, information about participation opportunities and other ways of supporting our organisation or the sport, provided you have indicated that you are happy to be contacted for these purposes.** | Personal contact details such as name, title, email addresses and telephone numbers | Where you have given us your consent to do so.  |
| **To arrange and administer your attendance at an event you have entered** | Personal contact details.Details of family members and emergency contacts. | This is necessary to enable us to register you on to and properly manage and administer your attendance at the event. |
| **To assess publish event results** | Name , gender, age and club members, records of personal performance | The purpose of the event is to provide results to participants. By entering the event you provide explicit consent for your name, gender, age and club membership to be included in these results. |
| **‘Special categories’ of Personal Information and Criminal Records** |
| **Storage of records relating to you.** | All ‘special categories’ of personal 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. |
| **Storage of records relating to your medical conditions** | Medical history and conditions | Where you provide details of medical conditions to assist us in the event of your illness or accident we will only use this if such an incident takes place. |
| **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 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 participate in the event.

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 benefits to you as a volunteer.

1. **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 us at chair@octavain-droobers.org.uk. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

1. Disclosure of your PERSONAL information

We share personal information with the following parties:

* + **Any party approved by you.**
	+ **We will make public the results of events you participate in,** which will include your name, membership number, club membership age, gender and performance. We will pass these public results on to pass these results on to partner organisations including British Orienteering, RouteGadget and WinSplits to provide public analysis services.
	+ **To any governing bodies or regional bodies for the sports covered by our club**: to allow them to properly administer the sports on a local, regional and national level.
	+ **Other service providers**: for example, email marketing specialists, payment processors, data analysis, CCTV contractors and IT services (including CRM, website, video- and teleconference services);
	+ **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.
	+ **Our affiliated clubs/NGBs or charities:** for the purposes of providing you with information on any further events where you have given your express consent to do so.

We do not disclose personal information to anyone else except as set out above.

1. **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.

1. **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 you last entered an event. Exceptions to this rule are:

* + CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime; and
	+ Information that may be relevant to personal injury claims may be retained until the limitation period for those types of claims has expired. For personal injury claims this can be an extended period as the limitation period might not start to run until a long time after you have volunteered for us.
1. **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.

1. **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.

1. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email [INSERT CONTACT ADDRESS] or write to us at [INSERT ADDRESS]:

**Version dated [ ] April 2018**