

PRIVACY NOTICE FOR PARENTS / CARERS OF PUPILS ATTENDING HERTFORD GYMNASTICS

Hertford Gymnastics collects data and information about parents / carers of our gymnasts so that we can operate effectively as a club. This privacy notice explains how and why we collect parent / carer data, what we do with it and what rights parents have.

The term "parent" is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the gymnast, with whom the gymnast lives or whether the gymnast has contact with that parent), and also includes non-parents who have parental responsibility for the gymnast, or with whom the gymnast lives. It is therefore possible for a gymnast to have several "parents" for the purposes of education law. This privacy notice also covers other members of gymnasts' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

Why do we collect and use parent / carer information?

We collect and use parent / carer information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about parents / carers is sensitive personal data, we will only process it where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

We use the parent / carer data to support our functions of running a school, in particular:

- a. to assess the quality of our services;
- b. to comply with the law regarding data sharing;

- c. for the safe and orderly running of the club;
- d. to send you communications that may be of interest to you which may include information about gymnastics events or activities;
- e. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- f. in connection with any legal proceedings threatened or commenced against the school.

The categories of parent / carer information that we collect, hold and share include:

Personal information (such as name, address, telephone number and email address);

Collecting parent / carer information

Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to communicate news about club activities and essential information for parents. Parents / carers may withdraw consent given in these circumstances at any time.

Storing parent / carer data

A significant amount of personal data is stored electronically, for example, on our mailing base. Some information may also be stored in hard copy format.

Data stored electronically may be saved on a cloud based system which may be hosted in a different country.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once you are no longer a parent / carer we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Who do we share parent / carer information with?

We routinely share parent / carer information with:

- schools that pupils attend after leaving us;

Requesting access to your personal data

Under data protection legislation, parents / carers have the right to request access to information about them that we hold ("Subject Access Request").

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the our data protection responsibilities.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Sarah Westley. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

DATA PROTECTION OFFICER

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.