

Dragon Tri Data Protection Policy

1. Purpose

This Data Protection Policy sets out our commitment to protecting your Personal Data and how we implement that commitment. It tells you how we handle your Personal Data, so that we comply with the General Data Protection Regulation EU 2016/679 ("GDPR"), and the rights you have when we hold it.

2. Who are we?

Dragon Tri ("we", "our", the "Club") are a triathlon club based in Pencoed, South Wales. You will find our contact details at the end of this Notice. 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.

3. 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 to which we have access. Your email address, telephone number and date of birth are examples of Personal Data.

GDPR also defines a special category of Personal Data as Sensitive Personal Data. Sensitive Personal Data includes health-related data.

In this policy, the term "Personal Data" is deemed to include any Sensitive Personal Data unless the context demands otherwise.

4. How do we process your Personal Data?

GDPR tells us how we must process your Personal Data. We comply with our obligations under GDPR by:

- protecting your Data from loss and misuse and from unauthorised access and disclosure;
- keeping your Data up to date – provided always that you tell us when something changes;
- deleting Data when we no longer have a reason to store it;

- not collecting or retaining Data which we do not need for our, government or other legally required administrative purposes.

5. What do we use your Personal Data for?

We collect and hold your Personal Data to enable us to:

- administer the Club in an efficient manner for the benefit of its members;
- ensure that we inform you of those events, activities, training sessions, triathlon-related services or races in which we believe you may be interested;
- process your Club membership fees and any other payments for activities for which we are required to request a fee;
- provide the contact details of members attending our training sessions or events for COVID-19 track and trace purposes when requested to do so by a representative of the government, NHS or local council, or someone acting on their behalf.

We collect and hold any Sensitive Personal Data to:

- Inform coaches of any medical conditions that might impact your ability to participate in an activity provide by us or that could be relevant if you had an accident or were taken ill at a Club activity;
- Confirm that you are not experiencing symptoms of COVID-19 infection and have not been in contact with anyone who has symptoms or a confirmed infection in the last 14 days prior to booking to attend a group training session, ride, or event.

We also collect and hold the personal details of a person that you have advised should be contacted if you are injured or unwell during a Club activity and unable to contact someone yourself.

6. What is the legal basis for us processing your Personal Data?

In order to join Dragon Tri you must agree to the Club's Terms and Conditions which notifies you of the existence of this policy and includes your agreement to be bound by this policy.

When applying for membership, you are also provided with the opportunity to register, entirely at your discretion, any additional Sensitive Personal Data of which you would like the Club to be aware. It is made clear that you should not enter personal information that you do not want to be processed.

7. How long do we keep your Personal Data?

We keep your Personal Data for as long as you are a member of Dragon Tri. If you provide written notice that you are leaving the Club, we will retain your information for twelve months from receipt of said notice, after which we will permanently delete your information. If you do not renew your annual membership, we will assume that you have left the Club with effect from the commencement of the relevant membership year and will retain your information until the end of that membership year, after which we will permanently delete your information.

8. Your rights regarding your Personal Data

Whether or not a member of the Club, you have the right to:

- request a copy of your Personal Data which we hold, without any charge;
- request that we correct any of your Personal Data found to be inaccurate or out of date;
- request that your Personal Data is erased where it is no longer necessary for us to keep it;
- withdraw your consent to the processing we carry out, provided always that, if you are a member, the Club shall then have the right to determine whether or not it wishes for you to continue as a member;
- request that we restrict further processing, where there is a dispute in relation to the accuracy or processing of your Data;
- lodge a complaint with the Information Commissioner's Office (ICO) and to seek legal recourse.

9. Further processing

If we wish to use your Personal Data for a new purpose not covered by this policy, we will provide you with a notice explaining this new purpose and seek your prior consent to the new purpose before we start any processing related thereto.

10. Contact details

If you have a problem or complaint or there is something you don't understand, please contact Stephen Butler on 07974 140424 or via email: steve@aim2tri.co.uk

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or by writing to:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF