**Privacy Policy**

Essex Metropolitan Netball Association is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with data protection laws.

This policy covers the different elements of personal information we collect from you, what we do with the information, how long we will hold it, what we won’t do with the information, as well as what rights you have.

**Introduction to Data Protection**

We have an obligation under Regulation (EU) 2016/679 of the European Parliament – the General Data Protection Regulation (‘GDPR’) to provide you with information about how and why we use your data. We recognise our obligations and your legal rights set out in the GDPR. We are committed to protecting and respecting your privacy by complying with the principles of the GDPR.

**Who are ‘we’?**

In this policy, whenever you see the words ‘we’, ‘us’ or ‘our’, it refers to Essex Metropolitan Netball Association (“EMNA”). We are the County Netball Association responsible for netball delivery in Essex Metropolitan County. EMNA is the controller of all personal data processed by EMNA.

**Data Protection Officer**

EMNA does not have a Data Protection Officer. However, for information and queries about data protection compliance, contact our Data Protection Lead (Jane Kelloe), email: umpiring@essexmet.co.uk.

**Amendments to our Privacy Policy**

If we amend our Privacy Policy, any changes will be published on our website. If necessary, this will be brought to your attention.

This policy was last updated on 11 September 2023.

**What is personal data?**

‘Personal data’ means any information relating to a living individual (‘data subject’) who can be identified, directly or indirectly by the information.

**The types of personal data we may collect**

The data we collect about you will vary, depending on our relationship with you. Below are examples of the sorts of data that we may collect:

* Full name and personal details (e.g. photograph, driving licence)
* Contact information (e.g. home address, email address, telephone numbers)
* Date of birth and/or age
* Next of kin and emergency contact information
* Family, lifestyle and social circumstances
* Imagery in video and/or photographic form and voice recordings
* Records of participation at events/sessions/competition
* Records of enquiries and other correspondence with you
* Records of course attendance/enquiries
* Membership of Academies
* Membership of EMNA
* Membership of the EMNA Executive Committee
* Qualification as a coach/umpire/technical official
* Any disciplinary or grievance information
* Any payment details you provide so that we can perform financial transactions with you
* Any details required for the purposes of awarding bursaries or grants (including means-testing)
* Names of club Covid-19 officers

**Special categories of personal data**

We may also collect, store and use the following ‘special categories’ of personal data regarding you:

* Information about your race, ethnicity, disability or sexual orientation
* Information about your health, including any medical condition, health and sickness records, medical records and health professional information
* Criminal records information

We may not collect all of the above types of personal data about you. In relation to the special category personal data that we do process, our basis for processing this information is indicated in the ‘How we use your personal information’ section below and, in addition, we will have obtained your explicit consent to do so.

**How we use your personal information**

We collect, store and process personal data for several purposes, mainly: membership, pathway, event and competition management, financial accounting, course attendance, qualification. We will not use any of the information that we collect from you, or about you, for any purpose other than those listed in this document or for purposes that are similar. If we would like to use your personal data in any other way, we will present you with relevant information at the point at which one of these additional purposes arises.

The GDPR provides that legally we might hold and process your information for any of the following four reasons and we have included below a summary of what that means for EMNA and how we might use information you provide to us:

Where required to perform a **CONTRACT**. For example:

* To administer and manage our relationship with our members
* To send members information about the benefits included in their County membership package
* To administer attendance at competitions, events, courses and training
* To fulfil contractual relationships with third parties

Where required to comply with our **LEGAL OBLIGATIONS.** For example:

* To comply with health and safety requirements
* To comply with safeguarding requirements
* To ensure equitable access to our services, to avoid discrimination
* For the prevention of fraud and other criminal activities

Where there is a **LEGITIMATE INTEREST.** For example:

* To correspond and to answer queries and complaints
* To ensure understanding of the coaching, officiating and volunteer workforce available
* To comply with awarding bodies’ accreditation requirements
* To administer and monitor attendance at events and competitions

Where you have provided **CONSENT.** For example:

* Inclusion on lists of coaches and umpires which may be circulated to EMNA clubs and other organisations which are members of England Netball
* Inclusion on list of Secretaries/other contacts on the EMNA website
* Inclusion of photographs at the annual EMNA AGM on the EMNA website
* Inclusion on list of Executive Committee members

We may use and process your personal information where you have **consented** for us to do so for the following purposes:

* Circulation of lists of coaches and umpires to EMNA clubs and other organisations which are members of England Netball for sourcing coaches/umpires
* Provision of contact details on the EMNA website for enquiries about clubs, including Secretaries/other contacts
* Taking photographs at the annual EMNA AGM for posting on the EMNA website
* Provision of generic contact details of Executive Committee members on the EMNA website, for enquiries/information

**Retaining your information**

If we collect your personal information, the length of time that we retain it is determined by a number of factors, including the purpose for which we use that information and to comply with our other legal obligations (apart from GDPR). We maintain a Retention Schedule, which records approved retention periods, the reasoning for the retention period and end of life treatment.

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

* Financial information-7 years
* Special category data-6 years, unless required for a longer period in relation to any legal claim
* Disciplinary information-5 years
* Participation in Academies and Leagues-for the relevant season
* Course attendance/qualification-indefinitely
* Names of club Covid-19 officers-the earliest of the end of the relevant season, until there is a change in a club Covid-19 officer or when club Covid-19 officers are no longer required

We do not retain personal information in an identifiable format for longer than is necessary. Where you have consented for us to retain your data, we will only hold the data for the duration of your consent.

**Children**

Children’s data are collected and processed in accordance with the information below. Parents and guardians are expected to ensure that the children they are responsible for are aware of how their personal data will be processed by us.

We require parental or guardian consent to process personal data of any child under the age of 14.

**Using your information for marketing**

We do not use your information for marketing commercial information to you.

**Sharing your personal data and data processing**

We only share personal data where we are required by law or with our suppliers or sub-contractors who carry out work for us and who you have given us permission to share it with. Other than the circumstances set out above, information about you will not be passed to a third party for any other purposes. All our suppliers and sub-contractors are required by their own data sharing agreements or contracts to treat your data as carefully as we would, to use it only as instructed, and to allow us to check that they do this.

Organisations we share your personal data with

* England Netball and London & South East Region Netball
* EMNA clubs
* Other organisations which are members of England Netball
* Third parties, where the law requires it, we are under a duty to comply with any legal obligation or to protect the rights, property or safety of our members or others, including exchanging information for the purposes of fraud protection

**Profiling**

EMNA does not perform any profiling that has legal or significant effect nor any automated decision making.

**International transfer**

We do not transfer the personal information that we collect to countries outside of the UK and the European Union.

**Information Security**

Where we have given you a password, which enables you to access any EMNA information, it is your responsibility to safeguard that password against the possibility that others may use it to gain unauthorised access. Do not store the password anywhere, in written or electronic form, or give it to someone else. Please let our Data Protection Lead, umpiring@essexmet.co.uk, know if any record containing that password is lost or stolen or if you think there has been a possibility that your security has been breached.

**More on Information Security**

We do our very best to keep personal information secure wherever we collect personal data online. We place a great importance on the security of all personally identifiable information associated with our members and users. We will take all steps reasonably necessary including policies, procedures and security features to ensure that information about you is treated securely and protected from unauthorised and unlawful access and used in accordance with this privacy policy. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control or being transferred, we use our best efforts to try to prevent this.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**What we don’t do with your information**

We never sell your information to other organisations to use for their own purposes.

**Your rights**

The GDPR grants you certain rights (‘information rights’) which we summarise below.

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| Right of access | You have the right to obtain confirmation from EMNA as to whether or not personal data concerning you are being processed, and, where that is the case, you have the right to access that personal data. |
| Right to rectification | You have the right to oblige EMNA to rectify inaccurate personal data concerning you. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed by providing a supplementary statement. |
| Right to erasure (right to be forgotten) | You have the right (under certain circumstances, but not all) to oblige EMNA to erase personal data concerning you. |
| Right to restriction of processing | You have the right (under certain circumstances, but not all) to oblige EMNA to restrict processing of your personal data. For example, you may request this if you are contesting the accuracy of personal data held about you. |
| Right to data portability | You have the right (under certain circumstances, but not all) to oblige EMNA to provide you with the personal data about you which you have provided to EMNA in a structured, commonly used and machine-readable format.You also have the right to oblige EMNA to transmit the data to another controller. |
| Right to withdraw consent | If the lawful basis for processing is consent, you have the right to withdraw that consent. |
| Right to object to direct marketing | Where your personal data are processed for direct marketing purposes, you have the right to object at any time to processing of your personal data for marketing, which includes profiling to the extent that it is related to such direct marketing. |
| Rights in relation to automated decision making and profiling | EMNA does not perform any automated decision-making based on personal data that produces legal effects or similarly significantly affects you.  |

**Your right to lodge a complaint with a supervisory authority**

If you wish to exercise any of your rights concerning your personal data, you should contact us at umpiring@essexmet.co.uk

EMNA is not a ‘public authority’ as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act.

If you are not satisfied with the response you receive, you have the right to lodge a complaint with the supervisory authority. In the United Kingdom this is the Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 0303 123 1113, email: casework@ico.org.uk.

11 September 2023