

SANKAKU AIKIDO CLUB

PRIVACY NOTICE TO OUR MEMBERS

We are committed to respecting your privacy, and the rights of all individuals. This notice explains how we may use your personal information (before, during, and after your membership with us), how we comply with the law on data protection, and what your personal rights are.

References to 'we', 'our' or 'us' in this privacy notice are to Sankaku Aikido Club.

RESPONSIBILITY FOR THIS PRIVACY NOTICE

In our club the Club Leader has overall responsibility for data protection compliance. Lancashire Aikikai (the Aikido association of which we are a member) has appointed a Data Protection Co-Ordinator to whom enquiries can be made. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

HOW WE COLLECT YOUR INFORMATION

We typically collect personal information when you apply to become a member, when you renew your annual membership, when you make a request for information, or when you correspond with us by phone, e-mail or in some other way.

If you are providing us with details of emergency contacts they have a right to know, and to be aware of, 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 them. They also have the same rights as set out in the section "Your rights in relation to personal information" below.

KEEPING YOUR PERSONAL INFORMATION UP TO DATE

It is important to ensure that the personal information we hold about you is accurate and up-to-date. Please let us know if anything changes, for example if you change your phone number or email address, or if the details of your Emergency Contact person change.

PERSONAL INFORMATION WE HOLD ABOUT YOU

Typically, this will include the following examples:

- Personal contact details that allows us to contact you directly such as name, title, email address and telephone number
- Age
- Date of birth (if under 18)
- Gender
- Membership start and end date
- Records relating to your interactions with us such as emails and other correspondence
- Records of your attendance at classes, and any other events hosted by us
- Records of any payments made to us by you
- Images in video and/or photographic form
- Details of emergency contacts
- Records of achievement, including assessments of any gradings you have obtained
- Records of any coaching qualifications obtained, and certificates of first aid training and safeguarding
- Records maintained by the coaching team that record a log of teaching delivered at classes and courses
- Accident records and health and safety risk assessments

SPECIAL CATEGORIES OF PERSONAL DATA

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your health, including any medical condition, that could affect your training

- Information that confirms DBS clearance has been obtained (for those engaged in a regulated activity only)

If we have obtained special category personal data from you, we process it on the basis that,

- it is necessary for the potential exercise or defence of legal claims;
- it is necessary for the purposes of carrying out our safeguarding obligations; or
- we have your explicit consent.

HOW WE USE YOUR PERSONAL INFORMATION

The table below describes the main purposes for which we process your personal information, the types of data involved, and our lawful basis for being able to do this.

| PURPOSE | TYPE OF DATA | LAWFUL BASIS |
|---|---|--|
| To administer your membership and manage our relationship with you | All contact and membership details, records of your interactions with us, records of payments made to us. | This is necessary to enable us to properly manage and administer your membership terms and conditions with us. |
| To send you information we believe you would find useful, including our newsletters, member information, events, courses, and information about other clubs, associations, and national governing bodies | Contact details. | Our legitimate interest in promoting the activities of the club, and / or where you have given us your explicit consent to do so. |
| To answer your queries or complaints | Contact details and records of your interactions with us. | We have a legitimate interest to provide complaint handling processes in case there are any issues with your membership. |
| Retention of records | All the personal information we collect. | We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or regulatory obligations to retain records. We also have a legitimate interest in retaining records as they might be relevant in relation to legal claims. We process special category personal data on the basis of the “special categories of personal data” reasons referred to above. |
| For the purposes of promoting the club, our events, and benefits of membership. | Images in video and/or photographic form. | Our legitimate interest in promoting the activities of the club. |
| To administer your attendance at any courses or programmes you sign up to | All contact and membership details, records of any payments made to us, records of gradings. | This is necessary to enable us to register you on, and properly administer your attendance on, the course or programme. |

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| To comply with health, safety and safeguarding requirements | Records of attendance, accident records, contact details of your emergency contact person, information about your health and medical conditions relevant to training. | We have a legal obligation and a legitimate interest to provide you and other members of our club with a safe environment in which to participate in a martial art. We process special category personal data on the basis of the “special categories of personal data” reasons referred to above. |
| To use information about your physical or mental health (including any injuries) to ensure your health and safety and to assess your fitness to participate in any events or activities we host | Health and medical information. | We process special category personal data on the basis of the “special categories of personal data” reasons referred to above. |
| To gather evidence for possible legal claims, or for the submission of reports to the BAB (national governing body) and/or the BAB’s insurer | All the personal information we collect. | We have a legitimate interest in using such records to gather evidence whilst they might be relevant in relation to legal claims. We also have an obligation to a third party (the BAB and their insurer). We process special category personal data on the basis of the “special categories of personal data” reasons referred to above. |
| To comply with legal obligations, for example, regarding children or vulnerable adults to comply with our safeguarding requirements | Confirmation for those engaged in regulated activities that DBS clearance has been obtained | For criminal records history we process it on the basis of legal obligations or based on your explicit consent. |

Where you have given us your consent to use personal information in a particular manner, you have the right to withdraw this consent at any time. 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 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 member benefits to you, including being able to practice with us.

MARKETING AND PROMOTIONS

From time to time, we may contact you by email with information about news and events we believe you may be interested in. We will only send such emails to you in accordance with our legitimate interest in promoting the club, and Aikido in general. You can let us know at any time that you do not wish to receive such messages.

SHARING OF YOUR PERSONAL INFORMATION WITH THIRD PARTIES

We may share personal information with the following third parties:

- Any party specifically approved by you
- Governing bodies for Aikido to allow them to properly administer on a local, regional and national level
- Public bodies with responsibility for sports accreditation, such as Sport England
- We may use an external email distribution list management system (for example ‘Mailchimp’)

TRANSFERS OF YOUR PERSONAL DATA OUTSIDE THE EEA

The personal information we collect is not generally transferred to countries outside the UK or the EEA (“European Economic Area”).

Your personal information may be transferred to countries outside the UK or the EEA when registering your membership and gradings with Yokohama International Aikido Club and Hombu Dojo, both in Japan. We will take all reasonable steps to ensure that your personal information is respected and kept secure. The relevant authorities in Japan are also finalising a privacy compliance agreement with the EU Data Protection Board. For further details please contact us by using the details set out in the "Contacting us" section below.

HOW LONG WE KEEP YOUR PERSONAL INFORMATION

Information that may be relevant to personal injury claims may be retained until the limitation period for those types of claims has expired. As some member associations of the BAB (the National Governing Body) have children as young as 4 years old participating in Aikido, the BAB has mandated that all member associations, and their clubs, must retain personal data of former members for up to 17 years after membership ends (because a child has up to three years from their 18th birthday to lodge a personal injury claim).

Therefore, we retain all physical and electronic records for a period of 17 years after the end of your membership, for the purposes of legal and regulatory requirements.

YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

In relation to your personal information, you have the right to:

- Be informed about how your personal information is being used
- Access the personal information we hold about you
- Request the correction of inaccurate personal information we hold about you
- Request the erasure of your personal information in certain limited circumstances
- Restrict processing of your personal information where certain requirements are met
- Object to the processing of your personal information
- Request that we transfer elements of your data either to you or another service provider
- Object to certain automated decision-making processes using your personal information

You should note that some of these rights may not apply as they have specific requirements and exemptions that apply to them. Some have no conditions attached, for example your right to withdraw consent is an absolute right.

Whilst this privacy notice sets out a general summary of your rights, we appreciate this is a complex area of law. More information about your rights can be found on the Information Commissioner's website at ico.org.uk. The ICO is the supervisory authority for data protection within the UK. If you are unhappy with the way we are using your personal information you can also submit a complaint to the ICO, however, we are here to help and we would encourage you to contact us to resolve your complaint first.

CHANGES TO THIS PRIVACY NOTICE

We may update this privacy notice from time to time. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. If we are required by law to obtain your consent first, we will seek your consent to changes in the way we use your personal information.

CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please contact your Club Leader, or alternatively you can contact the Lancashire Aikikai Data Protection Co-ordinator via email data@lancashireaikikai.org.

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