**KENILWORTH CRICKET CLUB**

**PRIVACY NOTICE FOR OUR JUNIOR PLAYERS AND PARENTS**

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 child's registration to participate in coaching with us and represent us in games. This notice applies to you and your child if you have registered your child to attend cricket coaching at our club or your child is playing in games organised by the club. 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 Kenilworth Cricket Club

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we not required to do so, but our Data Protection Compliance Manager 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 we may collect from you

Depending on the type of your child's registration with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

* + personal contact details that allows us to contact you directly such as your (and where applicable your partner's) name, title, email addresses and telephone numbers;
  + your child's name and your child's date of birth;
  + your child's gender;
  + registration start and end date;
  + references you request we provide on your child;
  + other information included as part of the application process for registration;
  + records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
  + any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
  + use of and movements through the Teamer online portal, passwords you create on Teamer which are stored by Teamer, and other IT system identifying information;
  + records of your child's availability/non-availability for events/matches/games;
  + records of your child's attendance at any events organised by us;
  + CCTV footage and other information obtained through electronic means;
  + images in video and/or photographic form and voice recordings;
  + your marketing preferences, including if you have signed up through All Stars, so that we know whether and how we should contact you;
  + details of any county or district selection;
  + details of your child's emergency contacts and family members;
  + details of your child's school and school year;
  + records of your child's achievements and performance such as wickets taken and runs scored;
  + game/competition results, details regarding events/matches/games attended and performance (including that generated through player pathway programme);
  + any disciplinary and grievance 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 child's race or ethnicity, religious beliefs and sexual orientation; and
  + information about your child's health, including any medical condition, health and sickness records, medical records and health professional information.

We may not collect all of the above types of special category personal 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 for the purposes of carrying out the obligations and exercising our 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”.

In the event we ask for you to complete a DBS, we may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

1. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about you (and your partner) and your child when you apply for your child to attend our coaching at the club, register to attend All Stars, you register an account for your child or yourself with one of our teams on Teamer, when your child attends a holiday course, when you purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of the application process for registration.

If you are providing us with details of family members and 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 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 the 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** |
| **To administer any registration for coaching you have made for your child with us and managing our relationship with you and your child, including dealing with payments and any support, service or coaching enquiries made by you** | All contact and registration details of you and your child, transaction and payment information, records of your interactions with us, and marketing preferences. | This is necessary to enable us to properly manage and administer your child's coaching with us. |
| **To arrange and manage your child's coaching and participation in events/games/matches** | Contact details, transaction and payment information.  Records of your interactions with us. | This is necessary to enable us to properly administer your child's coaching and participation in events/games/matches with us. |
| **To register your child with the league organisers of junior matches (and where relevant senior matches) including adding your child's name to Play Cricket (the junior match records and scoring system)** | Name of child and date of birth (and address and school if requested by the Warwickshire Cricket Board) | This is necessary to enable us to actively participate in our local leagues as the administrators require information on the players participating to validate our player registrations. Matches are also scored on Play Cricket which automatically creates a player profile and statistics on each of our players as the results and personal performances of each game are added. |
| **To send you information about coaching, indoor nets, events/games/matches, rules on competitions we have entered, renewals of registrations or any benefits received from the WCB/ECB which may be relevant to you** | Contact and registration details. | This is necessary to enable us to properly manage and administer your child's coaching and participation in events/games/matches with us and so your child gets the most out of their attendance at our coaching. |
| **To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about coaching, events, products and information about our commercial partners** | Contact details and  marketing preferences. | 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 services to you in case there are any issues with your child's coaching/registration with us. |
| **Retention of records** | All the personal information we collect. | We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your child's participation in our junior activities and run our club and in some cases we may have legal or regulatory obligations to retain records.  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.  For criminal records history we process it on the basis of legal obligations or based on your explicit consent. |
| **The security of our IT systems** | Your usage of our IT systems and online portals. | We have a legitimate interest to ensure that our IT systems are secure. |
| **To conduct data analytics studies to better understand event attendance and trends within the sport** | Records of your attendance at any events or competitions hosted by us. | We have a legitimate interest in doing so to ensure that our coaching is targeted and relevant. |
| **For the purposes of promoting the club, our events and membership packages.** | Images in video and/or photographic form. | Where you have given us your explicit consent to do so. |
| **To comply with health and safety requirements** | Records of attendance, CCTV footage and other information obtained through electronic means, medical information about your child's health | We have a legal obligation and a legitimate interest to provide you and other junior players and members of our organisation with a safe environment in which to participate in sport.  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. |
| **To administer your attendance at any courses or programmes you sign up to** | All contact and membership details,  transaction and payment data.  Details of any county membership and performance data. | This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or programme. |
| **To arrange for any game, trip or transportation to and from an event** | Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information. | This is necessary to enable us to make the necessary arrangements for the game, trip and/or transportation to an event.  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. |
| **To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.** | Health and medical 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. |
| **To gather evidence for possible grievance or disciplinary hearings** | All the personal information we collect | We have a legitimate interest in doing so to provide a safe and fair environment for all junior players and to ensure the effective management of any disciplinary hearings, appeals and adjudications.  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.  For criminal records history we process it on the basis of legal obligations or based on your explicit consent. |
| **For the purposes of equal opportunities monitoring** | Your child's name, title, date of birth  gender, information about your race or ethnicity and health and medical information | We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.  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. |
| **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 admit your child on one of our coaching courses or play them in a game situation or we may not be able to properly provide your child with coaching or comply with legal obligations and we may have to terminate your child's registration. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly engage your child in all the club's activities.

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 involve your child in all our junior activities.

1. **DIRECT MARKETING**

**Email, post and SMS marketing**: from time to time, we may contact you by email, post or SMS with information about coaching, games or, the club's activities 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 either unsubscribing from Teamer or texting Jane Thomas on 07979 597320.

1. Disclosure of your PERSONAL information

We share personal information with the following parties:

* + **Any party approved by you.**
  + **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.
  + **To Teamer** as that is the platform on which player availability for events is managed.
  + **To Playcricket** as that is the platform upon which results and performances are uploaded.
  + **Other service providers**: for example, email marketing specialists, payment processors, data analysis CCTV contractors, promotional advisors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
  + **Our Commercial Partners:** for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by the WCB, ECB or our commercial partners
  + **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.

1. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

Please note that Teamer operates out of the Republic of Ireland and provides services to teams in many countries. The personal information we collect through Teamer may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. Please do read Teamer's privacy policy in this regard as we rely on them to fulfil their obligations to you.

All other types of personal information will not be transferred to and/or stored in countries outside of the UK and the European Union.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

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 your last contact with us or the end of your child's registration. 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;
  + Details regarding unsuccessful applicants for registration where we hold records for a period of not more than 12 months;
  + Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through Teamer. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

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. 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 either email thetowncc@gmail.com or write to us at Kenilworth Cricket Club, Warwick Road, Kenilworth, CV8 1FE

**Version dated 24 January 2019**