



## **PRIVACY POLICY (DATA PROCESSING NOTICE)**

This is the Privacy Policy of the Guernsey Sports Commission LBG. It is issued in compliance with the Data Protection (Bailiwick of Guernsey) Law, 2017 “the Law”.

We care about your personal data and ensuring you are informed about how we use it. We promise to protect your data, and to manage any information you share with us in line with data protection law.

This Privacy Policy sets out how and why we collect and use your personal data and our legal basis for doing so.

It applies whenever we collect your personal data (including when you use our website or other digital platforms), so please read it carefully.

### **ABOUT US**

We are the Guernsey Sports Commission LBG. We are a registered charity in Guernsey. Our company registration number is 41617 and we are also a member of the Association of Guernsey Charities membership number 260. We are also registered with The Office of the Data Protection Authority (registration number DPA 1691).

### **HOW TO CONTACT US ABOUT YOUR PERSONAL DATA OR THIS PRIVACY POLICY**

We are defined as a Controller under Guernsey Law and if you have any questions about this privacy policy or about your personal data, please write to us at:

*Data Protection Officer, Guernsey Sports Commission, The Coach House, Beau Sejour Centre, Amherst, St Peter Port, GY1 2DL or email [info@guernseysports.com](mailto:info@guernseysports.com)*

### **CONTACTING THE REGULATOR**

If you feel that your data has been handled incorrectly or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the data protection regulator – The Office of the Data Protection Authority (ODPA). You can contact them for advice by telephoning (01481) 742074 or by email to [enquiries@opda.gg](mailto:enquiries@opda.gg) or you can submit a complaint online at [www.odpa.gg](http://www.odpa.gg) and complete the ‘make a complaint’ section.

## **WHAT DATA WE MAY COLLECT**

When we provide you with services we may collect and store any personal information that you provide to us. We may collect and process the following types of personal data:

- Your work and home details, such as email address, postal address and/or telephone number (both landline and mobile)
- Date of birth and gender
- **Your medical details**
- Your bank details
- Details of your social media accounts
- Family details
- Details of your professional life including your interests
- Details of your interactions with us, including any which occur electronically or in person.
- Information from your computer or device. When you browse the website, information is sent to us which includes your IP address, what pages you have visited, your device type and internet browser details. Your IP address may give information about your location. This data is used for analytical information to help us improve the website, and so service levels can be monitored and maintained or improved. The information we store can also be used to help prevent fraud.

Where we collect and manage information about children, we will manage it in a way which is appropriate to the age of the child. Information is usually collected when children are booked onto our activities by parents or carers. This information can be sensitive personal (Special Category) data if a medical condition needs to be disclosed for the purpose of participation. We will always keep this information secure and will never knowingly send marketing material to children.

We will always seek consent from a parent or carer before collecting information about children. Our services have specific rules about whether children can take part and we will make sure advertising for those events is age appropriate.

## **SPECIAL CATEGORY DATA**

This is defined in the Law as - Personal data revealing an individual's racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership, genetic data, biometric data, health data, data concerning an individual's sex life or orientation, & criminal data.

Under this section, we would only keep very brief medical records to ensure that our staff are aware of any medical condition(s) that you have that may interfere with the enjoyment of the activity that you are participating in.

The Guernsey Sports Commission require explicit consent from you **BEFORE** that data is obtained and processed and so consequently, we will ensure that this is made clear in the policy and a signed consent form completed and kept on file.

## **WHAT WE USE YOUR INFORMATION FOR**

All personal information that we collect about you will be recorded, used, and protected by us in accordance with applicable data protection legislation and this privacy policy. We may supplement the information that you provide with other information that we obtain from our dealings with you.

In broad terms we use your data for the following purposes:

- To administer and provide services you request or have expressed an interest in
- To keep a register of attendance
- To communicate with you if any of our services you have requested are unavailable
- To manage your account and arrange for payment
- To trace and recover any debts incurred
- To ensure we can contact you (or a relevant family/friend) in the event of an emergency occurring during participation in our services
- To be compliant with health and safety procedures, particularly in the event of an accident
- To personalise and tailor any communications that we may send you
- To enable us to administer any competitions or other offers
- For profiling purposes to enable us to personalise and/or tailor any marketing communications that you may consent to receive from us
- For promotional and marketing materials and activities, including photos and videos
- To investigate any complaints or questions you may raise
- Aid strategic development
- Other purposes reasonably ancillary to the above.

## **HOW WE COLLECT YOUR DATA**

We collect your personal data in the following ways:

1. When you register via our website

2. A paper copy application form when you book a course or are being referred on a course
3. Online registration of our courses
4. Your interaction with our staff both in person and on the telephone
5. When you contact us
6. Information we collect from our contact on social media (including but not limited to Facebook, Twitter and Instagram)
7. Information available publicly. This may include information found in places such as schools, sports associations or other agencies.

## **YOUR RIGHTS RELATING TO PERSONAL INFORMATION UNDER THE LAW**

The Law provides you with a number of rights, but specifically and of relevance, you have the right to:

- request confirmation of the personal data that we hold about you and what we are doing with your data
- request correction of your personal data if incorrect, out of date or incomplete
- request that we stop any consent-based processing of your personal data after you have withdrawn that consent

Further information can be obtained from the Office of the Data Protection Commissioner (Authority)

If you want to exercise your rights, have a complaint, or just have questions, please contact the Guernsey Sports Commission.

## **COLLECTION OF INFORMATION BY THIRD PARTIES**

The Guernsey Sports Commission website contains links to other sites whose information practices may differ from those of the Guernsey Sports Commission. If you should visit such third-party sites, you should ensure that you review the appropriate privacy notices as we have no control over information that is submitted to, or collected by, these third parties.

[For the specific privacy policy relating to our website, please see the section further down this policy.](#)

## **SHARING YOUR PERSONAL DATA**

We may share your data with third parties (a) if we are under a legal or regulatory duty to do so, (b) if it is necessary to do so to enforce our terms of use, terms and

conditions of sale or other contractual rights, (c) to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity, (d) where such disclosure is necessary to protect the safety or security of any persons, and/or (e) otherwise as permitted under applicable law.

We might also share your personal data in order to effectively deliver our services. This might be because another agency has been contracted to provide a service, or because responsibility for services is shared across multiple agencies or authorities, such as health and social care. If we share information regularly with another organisation, the conditions for sharing your personal data are set out in an Information Sharing Agreement.

Your personal information will not be transferred outside of the Bailiwick of Guernsey.

## **HOW WE KEEP YOUR DATA SECURE**

We take the security of your personal information seriously. If you submit your credit card details to us, we will use industry standard Secure Sockets Layer (SSL) encryption technology to guard your information. We do not store your credit or debit card details in full, following the completion of your transaction. All card details and validation codes are securely destroyed once the payment has been processed with just the last four digits of your card number being kept. This is used as a unique identifier and is not enough information to take any further payment from your card. Only staff authorised to process payments will be able to see your card details.

In addition, we have security procedures in place to protect our paper-based systems and computerised databases from loss and misuse, and only allow access to them when it is absolutely necessary to do so, and then under strict guidelines as to what use may be made of the personal information contained within them.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff and volunteers. Anyone with access to personal information must sign a confidentiality agreement as part of their contract which, among other things, includes strict regulations on the processing of personal data.

## **HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. Your personal data is kept in line with the Guernsey Sports Commission’s Retention Schedule. The retention schedule sets out the kind of information the organisation creates and uses, how long it should be kept and what should be done with it at the end of its ‘life’.

## RETENTION SCHEDULES

Purpose of data	Categories of personal data	Legal basis for processing	Retention Period	Shared with third party
Administration and delivery of courses and services	Name & Surname Email addresses Postal addresses Gender Age School Medical Conditions Bank details	Consent	5 years	Coaching staff Health professionals
Supporting sports clubs, associations, coaches and volunteers	Name & Surname Email addresses Postal addresses Gender Age	Consent	5 years	Industry partners

Marketing of services including newsletters, mailing lists, competition and imagery	Name & Surname Email addresses Postal addresses Gender Imagery of people Age	Consent	Newsletter: 5 years Imagery: 7 Years Competitions: 5 Years	None
Data and statistics	Gender Age School	Consent	5 Years	Industry partners

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## THE WEBSITE

This section of our privacy policy relates to the website, [www.guernseysports.com](http://www.guernseysports.com) and governs the privacy of its users who choose to use it.

The policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. The way this website processes, stores and protects user data and information will also be detailed within this policy.

This website and its owners take a proactive approach to user privacy and ensure the necessary steps are taken to protect the privacy of its users throughout their visiting experience. This website complies to all UK national laws and requirements for user privacy.

### USE OF COOKIES

This website uses cookies to better the users experience while visiting the website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or disallow the use of cookies on their computer / device. This complies with recent legislation requirements for websites to obtain explicit consent from users before leaving behind or reading files such as cookies on a user's computer / device.

Cookies are small files saved to the user's computer hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience.

Users are advised that if they wish to deny the use and saving of cookies from this website on to their computers hard drive, they should take necessary steps within their web browsers security settings to block all cookies from this website and its external serving vendor

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information. You can read Google's privacy policy here for further information on <http://www.google.com/privacy.html>.

Other cookies may be stored to your computer hard drive by external vendors when this website uses referral programs, sponsored links or adverts. Such cookies are used for conversion and referral tracking and typically expire after 30 days, though some may take longer. No personal information is stored, saved or collected.

## **CONTACT & COMMUNICATION**

Users contacting this website and/or its owners do so at their own discretion and provide any such personal details requested at their own risk. Your personal information is kept private and stored securely until a time it is no longer required or has no use. Every effort has been made to ensure a safe and secure form to email submission process but advise users using such form to email processes that they do so at their own risk.

This website and its owners use any information submitted to provide you with further information about the products / services they offer or to assist you in answering any questions or queries you may have submitted. This includes using your details to subscribe you to any email newsletter programme that they operate independently of the website but only if this was made clear to you and your express permission was granted when submitting any form to email process. Or whereby you the consumer have previously purchased from or enquired about purchasing from the company a product or service that the email newsletter relates to. This is by no means an entire list of your user rights to receiving email marketing material. Your details are not passed on to any third parties.



## **EMAIL NEWSLETTER**

Our email Newsletter is independent of our website operation. Users can subscribe by emailing [info@guernseysports.com](mailto:info@guernseysports.com) should they wish to do so but do so at their own discretion. There is an opt-out/unsubscribe option facility available at the top of the newsletter.

If you would like a copy of the information held on you, please write to the business address at the bottom of this policy.

## **EXTERNAL LINKS**

Although this website only looks to include quality, safe and relevant external links, users are advised to adopt a policy of caution before clicking any external web links mentioned throughout this website.

The owners of this website cannot guarantee or verify the contents of any externally linked website despite their best efforts. Users should therefore note they click on external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## **ADVERTS AND SPONSORED LINKS**

This website may contain sponsored links and adverts. These will typically be served through our advertising partners, to whom they may have detailed privacy policies relating directly to the adverts they serve.

Clicking on any such adverts will send you to the advertiser's website through a referral programme which may use cookies and will track the number of referrals sent from this website. This may include the use of cookies which may in turn be saved on your computer hard drive. Users should therefore note they click on sponsored external links at their own risk and this website and its owners cannot be held liable for any damages or implications caused by visiting any external links mentioned.

## **SOCIAL MEDIA PLATFORMS**

Communication, engagement and actions taken through external social media platforms that this website and its owners participate on are custom to the terms and conditions as well as the privacy policies held with each social media platform respectively.

Users are advised to use social media platforms wisely and communicate / engage upon them with due care and caution regarding their own privacy and personal details. This website nor its owners will ever ask for personal or sensitive information through social media platforms and encourage users wishing to discuss sensitive details to contact them through primary communication channels such as by telephone or email.

This website may use social sharing buttons which help share web content directly from web pages to the social media platform in question. Users are advised before using such social sharing buttons that they do so at their own discretion and note that the social media platform may track and save your request to share a web page respectively through your social media platform account.

### **SHORTENED LINKS IN SOCIAL MEDIA**

This website and its owners through their social media platform accounts may share web links to relevant web pages. By default, some social media platforms shorten lengthy URL's [web addresses] (this is an example: <http://bit.ly/zyVUBo>).

Users are advised to take caution and good judgement before clicking any shortened URL's published on social media platforms by this website and its owners. Despite the best efforts to ensure only genuine URL's are published, many social media platforms are prone to spam and hacking and therefore this website and its owners cannot be held liable for any damages or implications caused by visiting any shortened links.

For any further information, please write to this address:-

Data Protection Officer  
Guernsey Sports Commission  
The Coach House  
Beau Sejour Centre  
Amherst  
St Peter Port  
GY1 2DL