

Athletics 365 Privacy Policy (last updated: 10th May 2019)

Introduction

This policy together with our app terms and conditions applies to your use of the Athletics 365 mobile application software (**App**), once you have downloaded a copy of the App onto your mobile telephone or handheld device.

Who we are

England Athletics Limited is the controller and is responsible for your personal data (**we, us or our**).

If you have any questions about this privacy policy, please contact them using the details set out below:

- Email address: dataprotection@englandathletics.org
- Postal address: Athletics House Alexander Stadium, Walsall Road Perry Barr, Birmingham, B42 2BE
- Telephone number: 0121 347 6543

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It may change and if it does, these changes will be posted on this page and, where appropriate, notified to you when you next start the App. The new policy may be displayed on-screen and you may be required to read and accept the changes to continue your use of the App.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during our relationship with you.

Third party links

The App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. Please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal data that may be collected through these websites or services. Please check these policies before you submit any personal data to these websites or use these services.

The data we collect about you

When you download and use the App, we will collect certain information about you which will include:

- **Contact Data:** includes full name and email address.
- **Content Data:** includes information stored on your Device, including login information and check-ins.
- **Profile Data:** includes your email address, username, unique reference number (**URN**) and password.
- **Usage Data:** includes details of your use of the App including, but not limited to, how often the App is being used and downloaded.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage to calculate the percentage of users accessing a specific App feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

How is your personal data collected?

We will collect and process the following data about you:

- **Information you give us.** This is information you consent to giving us about you by filling in forms on the App, or by corresponding with us (for example, by email). It includes information you provide when you register to use the App, make an in-App purchase and when you report a problem with the App. If you contact us, we will keep a record of that correspondence.
- **Information we collect about you and your device.** Each time you visit our App we will automatically collect data including how frequently the App is used and downloaded – this is provided to us by Apple and/or Google through their reporting service.
- **Information we receive from other sources including third parties and publicly available sources**

Device Data: includes the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting. Please note that this information is collected by Apple and/or Google and provided to us in report format.

How we use your personal data

We will only use your personal data when the law allows us to do so. Most commonly we will use your personal data in the following circumstances:

- Where you have consented before the processing.
- Where we need to perform a contract we are about to enter or have entered with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

We will only send you direct marketing communications by email or text if we have your consent. You have the right to withdraw that consent at any time by contacting us.

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Purpose for which we will use your personal data

Purpose/activity	Type of data	Lawful basis for processing
To install the App and register you as a new App user	Contact and Profile	Your consent
To provide the in-App content to those attending workshops, courses or anyone else at the complete discretion of England Athletics	Contact and Profile	Your consent
To manage our relationship with you including notifying you of changes to the App	Contact	Necessary to comply with legal obligations (to inform you of any changes to our terms and conditions to reflect legal updates or a change in services)

Disclosures of your personal data

Any personal data we collect, is shared with the following third parties:

- YUDU who manage the App and provides the portal to register participant's log in details
- British Athletics have access to all leaders, teachers and coaches personal information who are on England Athletics courses

- Apple and/or Google have access to personal information of users who download the App through their app store
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

We will only transfer your personal data outside the European Economic Area (**EEA**) if we have the appropriate safeguards in place and in compliance with data protection laws.

The data that we collect from you may be transferred to, and stored at, a destination outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our subcontractors. We will take all steps reasonably necessary to comply with Chapter V of the General Data Protection Regulation when transferring personal data outside of the EEA and to ensure that your data is treated securely and in accordance with this privacy notice.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the App; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Data Security

Where we have access to your personal data, we have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Apple and Google will store the relevant data for a user to download the App – please see their privacy policies for further information regarding their use of your personal data.

When England Athletics collect personal data via our workshops and courses, the data is collected on our secure booking system (Trinity) and then an API (application programming link) shares this data with YUDU (see **Disclosures of your personal data**)

Data Retention

By law we have to keep basic information about our participants (including: first name, surname, email address, URN, username and password) for six years after they cease being participants for tax purposes.

In some circumstances you can ask us to delete your data: see 'Your legal rights' for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your legal rights

Under certain circumstances you have the following rights under data protection laws in relation to your personal data:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Complain you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us at dataprotection@englandathletics.org in the first instance.

You also have the right to ask us not to continue to process your personal data for marketing purposes.