Privacy Notice

Achilles are committed to protecting and respecting your privacy. For any personal data you provide for the purposes of your membership, Achilles is the Data Controller and is responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way.

What personal data we hold on you

You may give us information about you by filling in the Achilles Membership Form online, or by corresponding with us by phone, e-mail or otherwise. As we do not require members to renew their membership each year, many members will have completed hard copy or online membership forms in the past. The information you give us includes:

- your name and contact details (primarily email address, but possibly also phone number and postal address), for identification (also as Athletics Data, as defined by England Athletics - see https:// www.englandathletics.org/clubs-community/club-management/gdpr-and-data-protection-advice or EA definition of athletics data);
- details of university and college attended, and years of matriculation and graduation, for Achilles qualification;
- date of birth, name of the EA-affiliated Clubs with which you are registered, gender and EA URN, as Athletics Data, as defined by England Athletics;
- your main event(s) and personal best(s), for team selection;
- any additional information that you have optionally provided, such as school, birthplace and subject studied, which may be included in Annual Reports or Varsity Match programmes, *as points of interest*; and
- your communication preferences (e.g. whether to receive the Annual Report electronically or as a hard copy).

We additionally hold the following data, which you do not provide us:

- Varsity Match years and events competed;
- · US Tour years attended; and
- miscellaneous other Achilles Tours and reunion events attended

Why we need your personal data

Achilles requires name and contact details to be able to deliver the Annual Report, and to keep members updated of upcoming fixtures, dinners, tours and other club-wide events.

The reason we need your Athletics Data is to be able to administer your membership, and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal is that we have a contractual obligation to you as a member to provide the services you are registering for. Achilles only requires Athletics Data for the purposes of registering athletes not registered with another EA-affiliated Club, or for entering athletes into competitions, where date of birth, gender and URN may be required. This information is otherwise optional.

Reasons we need to process your data include:

For competition/tour entry

- sharing personal data, and whether subs have been paid, with club team managers to enter events, and with club Tour managers for administration and team management;
 - Tour managers will only use information provided directly by Tour attendees for the purpose of the Tour, and this information is otherwise not shared
- sharing personal data with leagues and other competition providers for entry in events.

For membership and club management

- processing of membership forms and payments;
- sharing data with committee members to provide information about club activities, membership renewals or invitation to social events and Tours;
- club newsletters promoting club activity, and the Annual Report; and
- publishing of race and competition results

Marketing and communications (where separate consent is provided)

- sending information about promotions and offers from sponsors;
- sending information about selling club kit, merchandise or fundraising.

*ordinarily Achilles does not organise training, but this may be required on Club Tours.

We process data in respect of Training Competition / Tour Entry and Membership / Club Management on the basis of providing a service and legitimate interest, following due notification by the member, typically through completion of the Achilles Membership Form. With regard to Marketing and related material, we process data on the lawful basis of consent, and therefore in such cases we will also need your explicit consent to process this data, which we will ask for at the point of collecting it.

We only collect data about members and prospective members who have contacted Achilles regarding application for membership.

The club has the following social media pages:

- Achilles Club Facebook group (public): <u>https://www.facebook.com/groups/2313464688/</u>
- Achilles on Tour Facebook group (closed): https://www.facebook.com/groups/2346318795/

All members are free to join the Achilles Club Facebook group, with the Achilles On Tour Facebook group reserved for information relating to the US Tour series, and other Club Tours.

If you join one of the Social Media pages (or any future pages/groups), please note that the provider(s) of the social media platform(s) have their own privacy policies and that the club do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the club social media pages.

Who we share your personal data with

If you are paying full subs as a non-student member and are not registered with another EA-affiliated Club, then you can also choose to be registered as a member of England Athletics Limited with Achilles as your first-claim club. If you would like to register as a member of England Athletics Limited, then you will need to provide all required Athletics Data and explicitly consent to us sharing this information with England Athletics. We will then provide England Athletics Limited with your Athletics Data which they will use to enable access to the MyAthletics portal. England Athletics Limited will contact you to invite you to sign into and update your MyAthletics portal. You can set and amend your privacy settings from the MyAthletics portal. If you have any questions about the continuing privacy of your personal data when it is shared with England Athletics Limited, please contact dataprotection@englandathletics.org. If you do not consent, then we will not share your data with England Athletics Limited.

Please be aware that should you ever wish to compete in your sport (with the possible exception of road races, and specific other events) you will have to register with England Athletics Limited at that time. We recommend that you do this with another EA-affiliated Club if you have a first claim with any other Club, as this may additionally give you access to training, coaching, track access and competitions which Achilles does not enter as a Club. EA registration is annual, and you will need to confirm your registration each year.

The Club does not supply any personal data it holds for this purpose to any third party, other than England Athletics. The Club's data processing requires your personal data to be transferred outside of the UK for the purpose of cloud hosting. Where the Club does transfer your personal data overseas it is with the appropriate safeguards in place to ensure the security of that personal data.

We also include in the Annual Report a list of 'lost'/'missing' members, who are those members for whom we no longer have accurate contact details. This list only includes name, college/university attended, and year of attendance, and is intended for other members who are still in contact with the missing members to let them know we have lost contact. This information is publicly available online in past copies of the Annual Report, but the current Annual Report is only available to Achilles Members.

How long we hold your personal data

We will hold your personal data on file for as long as you are a member with us. Athlete data for those registered with England Athletics on the myAthletics portal is updated every year through the registration process. Any personal data we hold on you for that purpose will be securely destroyed after not longer than four years of inactivity on that member's account, in line with England Athletics Limited's retention policy. For other members, we will retain information regarding your athletics activity while at Oxford or Cambridge, and beyond, for historical and club archive purposes, but address and other data not required for those purposes will be destroyed after not longer than four years from the date on which an Annual Report is returned undelivered or it is otherwise apparent that

we have lost contact, and do not regain it within that timeframe. Your data is not processed for any further purposes other than those detailed in this policy.

Your rights regarding your personal data

As a data subject you may have the right at any time:

- to request access to, rectification or erasure of your personal data;
- to restrict or object to certain kinds of processing of your personal data, including direct marketing;
- · to the portability of the personal data you have provided us; and
- to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

In order to facilitate this, please email <u>membership.achilles@gmail.com</u>. To rectify/update data you provide, you can also complete the Achilles Membership Form again, with updated details.

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership.