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Privacy Policy

This is the Privacy Policy for the **Berks, Bucks and Oxon Cross Country Association** and for the services it provides be those services provided via this website or otherwise. It outlines your rights as a data subject as well as this organisation's obligations under the General Data Protection Regulation (GDPR).

About Us

The **Berks, Bucks and Oxon Cross Country Association (BBO)** organises an annual Cross Country Championship, currently scheduled to take place in the month of November, for clubs, universities, service units, colleges, schools and youth organisations whose headquarters are situated within Berkshire, Buckinghamshire and Oxfordshire. The **BBO** is affiliated to England Athletics; its registration number is 2662627.

Our Principles

- 1) We at the **Berks, Bucks and Oxon Cross Country Association** (collectively “**BBO**”, “we”, “us” and “our”) take your privacy and our security obligations seriously. We will strive to protect your personal information by using security technology appropriately. This means we ensure that:
 - i) Appropriate security measures will be in place to protect your personal information.
 - ii) When we ask another organisation to provide a service for us, that they will also have appropriate security measures in place.
- 2) We will respect your privacy and will not send any marketing material to you unless you have opted in to receive such marketing information. However, we may contact you to confirm the data you have provided or entered to ensure its accuracy.
- 3) We will only collect and use the personal information you have freely provided, be that verbally, in written form or electronically via forms on this website or using our third party contact management service.
- 4) We will be clear in our dealings with you as to what information we will collect about you and how we will use it and store it.
- 5) We will only use your personal information for the purposes for which it was originally collected and we will ensure that information is deleted securely as and when required.
- 6) Our website is accessible via the Internet. This therefore means that anyone around the world who visits our website can see anything posted there, namely any comments that you may post.
- 7) The only personal information details that are stored outside of the European Economic Area (EEA) relate to the member club contact details held in the **BBO**'s third party contact management service account. The contact details held in that account are detailed in the section below.

The Information We Collect

Personal and non-personal information may be collected either directly from you or automatically from your device as follows.

Data Directly Provided

When you use our products and services we collect the personal information that you provide us in relation to the delivery of those products and services, be that verbally, in writing or via email.

When you visit our website we collect the personal information that you provide us via our online forms for enquiries, event registration and contact management service (*provided via a third party contact management service*).

Examples of the information we collect are your names, your email address, your club/organisation name, your role title, as well as any other personal information you choose to provide us.

The contact details stored in the third party contact management service account are as follows:

- First name *
- Last Name *
- Email Address *
- Mobile number
- Telephone number
- Club/Organisation *
- Role *
- 2nd Role
- County

* = *Minimum required contact information.*

All contacts may request their details to be removed at any time.

Browser-Based Data Automatically Provided

As is the case for many websites we use cookies to improve website performance and the user experience. When you visit our website or another website or page that displays our event information certain non-personal information may also automatically be collected via cookies and other similar technologies that may include saving cookies to your device (*computer, tablet, mobile phone, for example*).

We may also collect non-personally identifiable browser-based information regarding how you use our website.

Examples of the information collected automatically relate to the device used to access our website and may include the following information: the name and version of the operating system used, the name and version of the web browser used, the device's current IP address, the referring website, the date, time and duration of the pages visited and search terms used. For further information, please refer to our Cookies Policy. The link is provided under the ***Legal & Contact Information*** section towards the end of this document.

Why We Use Your Information

Via Our Services

- To help organise fixtures
- To provide a fixture entry service
- To verify athlete entry data and competition eligibility using the England Athletics (EA) Licence Check tool
- To provide a fixture results service
- To respond to fixture entry and results enquiries
- To promote the sport of cross-country and athletics

- To investigate and prevent unauthorised access to our fixtures, and other fraudulent or illegal activities
- For any other purposes for which we notify users

Via Our Website

- For administration and reporting purposes including (*but not limited to*) troubleshooting, performance analysis, statistical analysis and testing
- To monitor and improve the performance of our website
- For the purposes made clear to you at the time you submit your information, to fulfil your request for information on our products and services, for example
- To ensure the safety and security of our website

Additionally, we may use the information you provide us via our services and/or our website to communicate with you via email and possibly other means regarding products, services, offers, promotions and events we think may be of interest to you or to send you our newsletter. The option to opt-out of such communication will always be available to you at any time.

Contact Management

We use a third party provider, **MailChimp**, to manage the contact details for member clubs (chairpersons, vice chairpersons, secretaries, treasurers, captains and cross country team managers) and suppliers to provide a facility to allow those contacts to manage their own contact details. For more information, please refer to their privacy policy:

<https://mailchimp.com/legal/privacy/>

Online Athlete Registration Checks

We use **England Athletics'** online athlete Licence Check facility to verify athlete entries for our fixtures. For more information, please refer to their privacy policy:

<https://www.englandathletics.org/privacy-policy>

Web Analytics

We use a third party provider, **Google Analytics**, to analyse our website traffic. For more information, please refer to their privacy policy:

<https://policies.google.com/privacy?hl=en-GB&gl=uk>

Children

We will collect personal information about young athletes under the age of 18 solely for the purpose of fixture race entry and results publishing. Any athlete under the age of 18 will require the consent of a parent or guardian in line with the policy of England Athletics.

Third Party Disclosure of Information

We do not sell your personal information to anyone under any circumstances.

We may share information, including personal information collected via our website, with trusted third parties that provide services for **BBO** such as chip timing, online registration, hosting and Internet connectivity. These third parties are prohibited from using the information we provide for purposes other than performing the services we prescribe.

Under certain circumstances we may be required to disclose your personal information in response to valid requests by public authorities such as the police or security services.

International Data Storage

BBO does not operate internationally. It is UK-based. However it does use the services of a third party contact management service, **MailChimp**, to store and process its contact records. The contact management service's servers are all located in the United States that has different data protection standards to the European Union. When we store our contact records in our contact management service account we make use of standard contractual clauses that have been approved by the European Commission.

We also use standard contractual clauses when we transfer your personal data to third parties outside the EEA or we adopt other means to ensure that adequate safeguards are applied to your personal data, such as a relevant third party's Privacy Shield certification or binding corporate rules (approved by EU data protection authorities and put in place to protect your personal data). The third party contact management service has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework.

If you have any questions or concerns about the security measures in place to protect your personal data when it is transferred/stored outside the EEA, please contact us using the details provided under the **Legal & Contact Information** section below.

Your Rights

You have the following rights at any time under the GDPR:

- 1) To be informed about your personal information
- 2) To request a copy of your personal information
- 3) To request the correction of your personal information
- 4) To request the erasure of personal data (also known as 'the right to be forgotten') in certain circumstances
- 5) To request that the processing of your personal information is suppressed in certain circumstances
- 6) To receive a copy of your personal information, free of charge, in a commonly used and machine-readable format
- 7) To object to the processing of your information under certain circumstances
- 8) To not to be subject to a decision based upon automated processing
- 9) To be informed of any personal data breach

For full details regarding your rights under the GDPR visit <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

Our Lawful Basis for Processing Personal Information

The following lawful bases are those under which **BBO** collects and processes your personal information:

- a) Legitimate Interests
 - To deliver and support our products and services

Advertising

Our website contains links to other websites that are clearly branded as 'sponsored by' in exchange for services provided by the third party to help promote **BBO** represent sponsored content, advertisement features and foundation funded features respectively. Otherwise our website does not permit any further advertising.

Links To Other Websites

Within the **BBO** website we do provide links to external resources or documents held on other websites that we believe to be useful, such websites are outside of our control. Those websites are operated by third parties and are subject to the third parties' own privacy policies. We cannot therefore accept any responsibility for their content or their privacy policies.

Data Retention

We will retain your personal data for such time as appropriate for administering your connection with us, after which we will securely delete/destroy your data:

- a) Online Entry Details: **2 years** for legal and insurance purposes.
- b) Agreement Records: **2 years** for legal and insurance purposes.
- c) Incident Forms: **8 years** for legal and insurance purposes.
- d) Athlete Fixture Entry Data: **2 years** for legal and insurance purposes.
- e) Fixture/Race Results: **INDEFINITELY**.

Legal & Contact Information

Under the General Data Protection Regulation (GDPR) that replaces the 1995 EU Data Protection Directive 95/46/EC and 1998 UK Data Protection Act (DPA) we are obliged to say who the 'data controller' is with respect to any products and services we provide, be they through traditional channels or via our website. The data controller is the organisation responsible for collecting and protecting information and, in our case, is the:

Berks, Bucks and Oxon Cross Country Association

For further legal information about privacy issues, you may find the following links useful:

- Our Cookies Policy – <https://bbocca.uk/files/admin/legal/cookies.pdf>
- The Information Commissioner's Office (ICO) – <https://ico.org.uk/>
- Data Protection Act 1998 – <http://www.legislation.gov.uk/ukpga/1998/29/contents>
- 1995 EU Data Protection Directive 95/46/EC – <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31995L0046>

If you would like access to or a copy of the personal information we hold about you, to request a correction, or have any questions about how we may use it or to make a complaint, please contact the Data Protection Manager via the address shown above or via email: **privacy@bbocca.uk**.

Complaints

Complaints will be dealt with by the Data Protection Manager, and will be responded to within 30 days at the latest.

If you are not satisfied with the way your complaint has been handled, you may be able to refer your complaint to your local data protection regulator. In the case of the United Kingdom this is the Information Commissioner's Office (ICO): <https://ico.org.uk/concerns>.

Changes to Our Privacy Policy

Should the decision be taken to change our privacy policy we will post the changes here. Where the changes are significant, we may also choose to email all our registered contacts with the new details. Where required by law, your consent will be obtained to make these changes.

Privacy Policy Changes by Date

26 July 2019 – Missing EA registration number added.

25 July 2019 – Privacy Policy reviewed for GDPR compliance and published on the website.