

# WARWICK SPORT PRIVACY NOTICE (GDPR)

# INTRODUCTION

Our participating students, clubs, customers and partners are extremely important to us, and this notice explains how (and for what reason) Warwick Sport and the wider University of Warwick collects, stores, manages and generally makes use of your personal data- that is any information that relates to you.

In this notice personal data will be referred to simply as 'information'.

We aim to be clear when we collect your information as to what we intend to do with it and only use it in a way you would reasonably expect.

# WHO WE ARE AND WHAT WE DO

Warwick Sport is part of the University of Warwick and supports the university's objectives through facilitating participation in activity and sport that builds healthy communities. We do this by offering a range of services and events and providing facilities for the provision of sport and active participation. We also provide advice and work in partnership with other key departments such as wellbeing support services. We work alongside Warwick SU to ensure student sport clubs have what they need to participate in their chosen sport during their time at University and we partner with national sporting bodies and associations to promote key sporting activities.

# **EXPLANATION OF TERMS**

References to "WS", "University", "we", "our" and "us" refers to Warwick Sport and UOW. References to "you" and "your" refers to students, clubs, customers, alumni, partners, donors and other stakeholders of Warwick Sport and UOW.

The General Data Protection Regulation will be referred to as "GDPR".

"Personal data" is any information that relates to you. It can also include expressions of opinions about you.

"Special personal data" is that of a more sensitive nature such as that relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. It also includes any processing of genetic or biometric information if the purpose is to uniquely identify an individual. It also includes information concerning [physical or mental] health or information concerning an individual's sex life or sexual orientation.

A "data subject" is the person who is the subject of the data i.e. it is about them.



### WHAT INFORMATION DO WE COLLECT

The information we collect (either directly from you or given to us by others such as our clubs and memberships or taken from student records) may include:

- name, title, gender and date of birth;
- student or staff ID (where applicable)
- contact details including postal address, email address, phone number and links to social media accounts;
- occupation and professional activities and memberships;
- participation requirements for example why you want to join Warwick Sport and what your personal objectives are
- recreations and interests;
- family and spouse/partner details and your relationships to other Warwick Sport members;
- records of communications sent to you by Warwick Sport or received from you;
- details of bookings, activities, classes, courses, or events you attended and when;
- information on your engagement with Warwick Sport Memberships and products;
- information about your use of Warwick Sport resources or facilities;
- information about your relationship with Warwick SU;
- financial information such as direct debits or payment records;
- company information;

In addition to the above we may also collect special personal data such as:

- Your race or ethnicity;
- Sexual orientation (not directly, but by knowing your gender and the details of your spouse);
- Your political preferences (where you provide this information directly or where published publically);
- Information about your physical and mental health -this may include information about the provision of health care services to you which reveal information about your health status



#### PURPOSES OF OUR PROCESSING AND OUR LEGAL BASIS

# **PURPOSES**

We process your information to enable us to market our services or those of third parties to you; to provide you with quotations; to register you as a user of our facilities; to record your use of our facilities; to manage any enquiry you make, to discuss, process and deliver your participation activity; to manage your membership experience with us and to process your payments; to correspond with you generally; to track your health and ensure your safety and well-being; to meet our safeguarding responsibilities; to provide suitable treatment and care; to follow up after classes, courses and events to gather feedback and new enquiries; to analyse our membership and participation information in order to better understand how to provide goods and services; to discuss the end of your membership with us, communicating in relation to a partnership activity or to gather feedback.

# THE LAW

We lawfully process your 'ordinary' information in one or more of the following ways:

- (a) you have given us consent [for example marketing to you by us or selected third parties] to process your information for one or more specific purposes;
- (b) processing your information is necessary for the performance of a contract you are a party to [your membership with us] or in order to take steps at your request [quotations] prior to entering into a contract;
- (c) processing your information is necessary for compliance with a legal obligation [health and safety, safeguarding etc.] to which the University is subject;
- (d) processing is necessary in order to protect your vital interests [where you suffer a serious accident necessitating the involvement of the emergency services];
- (e) processing is necessary for the performance of a task carried out in the public interest [the provision of sporting facilities] or in the exercise of official authority vested in the university;
- (f) processing is necessary for the purposes of the university's legitimate interests [operation of CCTV in the wider public interest and measures necessary to ensure we operate effectively and efficiently] or those of a third party but only where our interests override those of the individual concerned

We lawfully process your special data either where we have your explicit consent; to protect your vital interests - where you are incapable of giving consent; in connection with legal claims; for reasons of substantial public interest or for the purposes of preventative medicine or the provision of health treatment.



# **CONSENT/ CONTRACT**

If we rely upon your consent as the legal ground to process your information you have the right to withdraw your consent at any time.

You must provide some information to us in order for us to enrol you as a member or user of our facilities. If you do not provide the information necessary to do this then we will not be able to enrol you.

# HOW WE COLLECT YOUR INFORMATION (OTHERWISE THAN FROM YOU DIRECTLY)

Sometimes we receive information from the:

Student's Union, Wellbeing Services, by way of health care professional referral, from Harlands - our direct debit provider, from Alliance Leisure (sales), from NICAS and, from other partners.

### DO WE SHARE YOUR INFORMATION?

We may share some of your information with the following:

No	Name	Why
1	Gladstone	For the purposes of access and booking as the Leisure Management System
2	TA6 Alliance Leisure	For the purposes of membership sales
3	City of Coventry Swim Club	For the purposes of administrating the Learn to Swim Programme
4	Inspire2Coach	For the purposes of administrating the Tennis Centre
5	Harlands	For the purpose of processing online Direct Debits
6	NICAS	For monitoring progress in climbing
7	Mail Chimp	For email marketing purposes
8	University of Warwick Departments	For shared student and staff support services



# MARKETING

If at any time you would like to change your preferences to receive marketing communications then you can update your preferences at any time by logging in to Warwick Sport and accessing 'My account' or by contacting us by email at warwicksport@warwick.ac.uk

# YOUR RIGHTS

The table below briefly summarises your rights and where those rights and the information on those rights can be found within the GDPR. You can find more information about these rights on the ICO website.

	Rights	Article	
1.	To be informed about our use of your information	13/14	
2.	Access your own personal data	15	
3.	Right to correct errors in personal information (rectification)	16	
4.	Right to erase your personal information (right to be forgotten)	17	
5.	Right to restrict our processing of your information	18	
6.	Right to a copy of your personal information or transfer it to another controller (information portability).	20	
7.	Right to object to our information processing/direct marketing	21	
8.	Right not to be subject to automated decision-making	22	
9.	Right to be notified of a personal data breach that poses a high risk to your rights and freedoms	34	
If you wish to exercise any of the above rights, please see 'how to contact us', below.			



# HOW LONG DO WE KEEP YOUR INFORMATION

In short- for no longer than we need to.

For any user of our facilities we generally retain your information for 7 years after you cease to use our facilities.

Full details of the retention periods of records can be found by viewing the records management page and selecting the University's Record Retention Schedule (RRS), which is kept up to date separately.

# **HOW TO CONTACT US**

Please speak to a member of Warwick Sport first of all if you are unhappy with the way your information has been processed by phone 024 7652 3011 or by email at sportfeedback@warwick.ac.uk You can also contact our Data Protection Officer Ms Anjeli Bajaj via email at infocompliance@warwick.ac.uk After that, if you are still unhappy, you may contact the Information Commissioner at https://ico.org.uk/concerns/ or telephone 0303 123 1113.

# **FUTURE CHANGES**

This notice may be updated from time to time in order to reflect changes in the information that we process and how such information is processed. Where there has been a significant update we will publish the same on our website and publicise the fact around campus.

# **ADDITIONAL HELP**

If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'how to contact us' above).