International Pole Sports Federation

Privacy Notice 2020



www.polesports.org

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PRIVACY NOTICE

FOR MEMBERS, ATHLETES, PARTICIPANTS, COACHES/OFFICIALS, CUSTOMERS AND VOLUNTEERS

The IPSF is committed to ensuring that personal information is held fairly, lawfully and securely in accordance with data protection laws. This privacy notice describes how the IPSF will process and handle your data when collected to manage your involvement with the IPSF. This notice applies to you if you are a:

Member: a registered personal, group or federation member of the IPSF or a competition that has registered with the IPSF;

Athlete: an individual athlete who has registered his/her interest in participating in the sport competitively and/or whose details we have collected from one of our national, regional, counties, leagues, clubs, academies, schools, universities or other third-party referral;

Participant: an individual participant who has registered for one of our programmes or who has enquired about the programmes we offer and/or whose details we have collected from one of our national, regional, counties, leagues, clubs, schools, universities, session providers or other third-party referral;

Coach/Official: a coach, technical official, judge or other individual who has registered for one of our courses or who has enquired about the training courses and accreditation services we offer and/or whose details we have collected from one of our national, regional, counties, leagues, clubs, schools, universities, session providers or other third-party referral;

Customer: an individual who has purchased any of our merchandise or has purchased a ticket for one of our events, either directly or through a third-party, and/or signed up to receive updates about upcoming events, products, offers and ways to get involved further with the IPSF;

Volunteer: a volunteer who has signed up to volunteer at one of our events or programmes or is a committee member or volunteer at a registered region, county, league, club, academy, school or university.

It does not cover information that we collect about our paid employees, directors, contracted athletes and consultants.

This privacy notice covers the different elements of personal information we collect from you, what we do with the information, how long we will hold it, what we won't do with the information, as well as what rights you have. In this privacy notice, whenever you see the words 'we', 'us' or 'our', it refers to the International Pole Sports Federation more commonly known as the IPSF. We are the international governing body responsible for Pole and Aerial Sports delivery globally.

National, Regional Pole and Aerial Sports federations, County Associations, registered, clubs and programme providers will also be controllers of your data if you have become a member of them or registered for a programme/course that they are delivering. Each of these groups will have a specific privacy notice in place which will explain in more detail how they will process your personal data regarding your involvement with the IPSF.

The IPSF is not required to have a Data Protection Officer, but our Data Protection Lead has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

PERSONAL INFORMATION WE COLLECT

The data we collect about you will vary, depending on our relationship with you. Below are examples of the sorts of data that we may collect:

- personal contact details that allow us to contact you directly such as name, title, email addresses, postal addresses and telephone numbers;
- your membership number(s);
- details of next of kin and emergency contacts;
- date of birth;
- gender;
- identification documents such as passport, utility bills, identity cards, etc.;
- family, lifestyle or social circumstances;
- membership details including start and end date and any national, regional, counties, leagues and clubs that you are/have been a member of;
- coaching/teaching/officiating qualification and/or history;
- accreditation/qualification start and end date;
- records of any courses or sessions attended;
- records and assessment of any athlete rankings, gradings or ratings, competition results, details regarding events/championships/competition attended and performance;
- records of spectator attendance at events or competitions;
- any disciplinary and grievance information;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- any details required for the purposes of awarding scholarship funding or grants (including any means testing);
- suppliers, sponsors and client lists;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "special categories" of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- Criminal records information

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process our basis for processing this information is indicated in the "How we use your personal information" section.

SOURCES WE COLLECT YOUR PERSONAL INFORMATION FROM

We typically collect personal information when you create an account on the IPSF website or through the register for any programmes/courses, competitions/championships to purchase any services or products we offer online, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a athlete/participant of the IPSF we may also collect personal information about you from any national, region, county, league, club, academy, school, university, programme provider or other organisation you are a member of or participant at or from other referrals.

If you are providing us with details of family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with them. They also have the same rights as set out in the "Your rights" section below.

WHAT WE USE YOUR PERSONAL INFORMATION FOR

We collect, store and process personal data for several purposes, mainly: our membership, programme and course management and administration; performance pathway, event, league and competition management and administration; ticket and merchandise sales; financial accounting; and marketing. We will not use any of the information that we collect from you, or about you, for any purpose other than those listed in this document or for purposes that are similar. If we would like to use your personal data in any other way, we will present you with relevant information at the point at which one of these additional purposes arises.

The table below describes the main purposes for which we process your personal information and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis	Who
To administer any membership account(s) you have with us and managing our relationship with you, including arranging for any insurance and dealing with payments and any support, service or product enquiries made by you.	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us.	Member
To arrange and manage any contracts for the provision of any merchandise, tickets, products and/or services and to send information about these.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of merchandise, tickets, products and/or services.	Federation Athlete Participant Coach/Official Customer Volunteer

To send you information which	All contact and membership	This is necessary to enable us	Member
is included within your	details.	to properly manage and	
membership benefits package,		administer your membership	
including the membership		contract with us.	
newsletter and magazine and			
details about advanced ticket			
information, your insurance,			
competitions and events,			
partner offers and discounts			
and any updates on the IPSF.			
To keep you informed	Contact details and previous	We have a legitimate interest	Federation
about membership,	engagement.	to send you information that	Athlete
competitions and events,		is related to your previous	Participant
ticketing, participation		engagement and contracts	Coach/Official
products, courses/training		with us or related to	Customer
opportunities, volunteer		purchases that you have	Volunteer
opportunities and		made.	
merchandise related to			
your engagement with us.			
To send you other	All contact and membership	Where you have given us	Federation
marketing information	details and marketing	your explicit consent to do	Athlete
which you have requested	preferences.	so.	Participant
from us, including any			Coach/Official
additional newsletters,			Customer
information about			Volunteer
membership, competitions			
and events, ticketing,			
participation products,			
courses/training			
opportunities, volunteer			
opportunities, merchandise and information about our			
commercial partners.			
For the purposes of	Images in video and/or	Our competitions and events	Federation
promoting the sport, our	photographic form.	may be filmed for television,	Athlete
programmes, competitions		live streaming purposes and	Participant
and events, opportunities,		your personal information	Coach/Official
services and membership		may also be used in images	Customer
packages.		captured from our	Volunteer
		competitions and events. We	3.5
		have a legitimate interest to	
		use these for promoting the	
		sport and educational and	
		developmental purposes.	

For the purposes of promoting the sport, our programmes, competitions and events, opportunities, services and membership packages.	Images in video and/or photographic form.	We may occasionally take photos and/or videos during our participation programmes or courses. Where we do this we will request your consent to use these for promotional, educational and developmental purposes. Please note that photo/video permissions will be different for large-scale programmes or courses (more than 100 participants), during these you will be informed of the process for informing us if you do not wish your images to be used.	Federation Athlete Participant Coach/Official Customer Volunteer
To promote individuals and teams participating in our competitions and events and to provide details of those operating clubs, leagues, programmes, courses, counties, regions and Nationals. To promote our sponsors or	Images in photographic form and/or membership and profile details. Contact details.	We may use your personal profile image and/or profile details on any team, club, league, county or regional profile pages or session finders on our website or associated websites where you have given consent for this. Where you have given us	Federation Athlete Participant Coach/Official Customer Volunteer
partners' events, products or services.		your explicit consent to do so.	Athlete Participant Coach/Official Customer Volunteer

To create a better understanding of members, players, participants, coaches/officials, supporters/customers or volunteers we may undertake data analytics and research of those that engage with the IPSF.	Contact and membership details. Records of your attendance at any events, programmes, courses or competitions hosted by us or details of any purchases you have made. We use the information to create aggregated summary statistics only. From time to time, we may contact those groups listed to take part in additional research to support the development and improvement of the sport. However, there is no obligation to take part in the research. IPSF employees, or an external processor on our behalf, may carry out this research. For young people aged under 16 we will seek parental or guardian	We have a legitimate interest to ensure that we are offering the best service that we can, to understand trends and to enable us to improve the delivery of our sport.	Federation Athlete Participant Coach/Official Customer Volunteer
To correspond with you and answer your queries or complaints.	consent. Contact details and records of your interactions with us.	We have a legitimate interest to respond to your queries and provide complaint handling services to you in case there are any issues with your involvement with the IPSF.	Federation Athlete Participant Coach/Official Customer Volunteer
Retention of records.	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.	Federation Athlete Participant Coach/Official Customer Volunteer

Creation of a Single Sign On user account for our IT Systems.	Contact and membership details.	We have a legitimate interest that your experience of using our IT systems is as smooth as possible.	Federation Athlete Participant Coach/Official Customer Volunteer
The security of our IT systems.	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.	Federation Athlete Participant Coach/Official Customer Volunteer
To comply with health and safety requirements.	Records of attendance.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.	Federation Athlete Participant Coach/Official Customer Volunteer
To administer your attendance at any participation programme you sign up to.	All contact and participation details, transaction and payment data.	This is necessary to enable us to register you on to and properly manage and administer your participation on the programme.	Participant
To administer the relationship we have with an athlete on our performance pathway and at our satellite, county and national academies including to conduct performance reviews and determine performance requirements.	All performance and attendance data and information about your health and medical condition. Details of any affiliated club and/or county and/or region membership.	This is necessary to enable us to properly manage and administer your development through the performance programme.	Athlete

To make decisions about	All performance and	This is necessary to enable	Athlete
your progression and development through any player pathway programme and to assist with the delivery of rankings and ratings.	attendance data and information about your health. Details of any club and/or league and/or county and/or Region/national membership.	us to properly manage and administer your development through the performance programme.	Atmete
To administer and monitor your attendance at events and competitions.	All non-medical performance and attendance data. Details of any club and/or league and/or county and/or region/national membership.	This is necessary to enable us to register you on to and properly manage and administer your development through any events or competition structure.	Federation Athlete
To arrange for any trip or transportation to and from a competition or event.	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.	Athlete Coach/Official Volunteer
To assess your eligibility for and to provide any scholarship funding and/or grants.	All details required for the purposes of awarding scholarship funding or grants (including any means testing).	This is necessary to enable us to properly administer and perform any contract for the provision of funding.	Athlete Coach/Official
To administer your attendance at any courses or programmes you sign up to and to enable online assessment and to comply with awarding bodies' accreditation obligations (where applicable).	All contact and membership details, transaction and payment data. Details of your current club or other coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.	Coach/Official Volunteer

To conduct performance reviews, manage performance and determine performance requirements and to make decisions about progression and accreditation status.	All performance and attendance data and information about your health. Details of your current club or other coaching/teaching qualifications and/or officiating history. Qualification start & end dates.	This is necessary to enable us to properly manage and administer your development through the course and/or programme.	Coach/Official
To ensure understanding of the coaching and officiating workforce available.	Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history and/or location details.	We have a legitimate interest to understand the coaching and officiating workforce that is available to determine service needs and scheduling of courses.	Coach/Official
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements.	Information about your criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.	Federation Coach/Official Volunteer
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and/or to assess your fitness to participate and/or to provide appropriate adjustments to our service delivery.	Health and medical information.	We have a legal obligation to comply with health and safety requirements to ensure the safe running of our services and to make adaptations as required.	Federation Athlete Participant Coach/Official Customer Volunteer
To administer any disciplinary proceedings including gathering evidence for possible investigation, disciplinary or appeal panel hearings.	All the personal information we collect including any disciplinary and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.	Federation Athlete Participant Coach/Official Customer Volunteer

For the purposes of equal opportunities monitoring.	Name, title, date of birth, gender, information about your race or ethnicity, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation, health and medical information and performance data where provided.	We have a legal obligation to provide a sports environment that is inclusive, fair, accessible and non- discriminatory.	Federation Athlete Participant Coach/Official Customer Volunteer
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For some of your personal information there may be a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member or terminate your other involvements with the IPSF. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below or in your online marketing preference centre.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We share personal information with the following parties:

IPSF committee members, head Judges, Judges and judges support staff for the purpose of involvement in competition

Regional and County Associations to which you register with, become a member of, where you have attended a course within the respective Region or County or where you register with a club that is registered with the respective Region or County: to allow them to properly administer your involvement in our sports and provide information about Pole and Aerial Sports on a local, regional and national level.

Any league, club, university or academy to which you become a member of or participant at: to allow them to properly administer your involvement in Pole and Aerial Sports and provide information about our sports on a local, regional and national level. Limited information will also be made available to all leagues and clubs registered to the IPSF to enable them to administer athlete eligibility checks.

Our Programme providers: to enable them to administer and monitor your attendance on any programmes that they deliver and to provide you with information about the Programme and to send you other related information.

Data processors: for example, market research organisations, education and training providers, professional services, legal, financial, merchandise and information technology companies who provide or help to improve our products or services. The IPSF employs organisations to process personal data under a written contract that defines that they must comply with stringent data privacy requirements. The IPSF only employs organisations that agree through our contracts with them to comply with the provisions of the GDPR. These organisations are audited to ensure compliance

Our supply chain partners and sub-contractors: such as couriers, printers, travel agents and accommodation providers.

Our Commercial Partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners as part of your membership or participation package or where you have given your express consent for us to do so.

The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.

Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

Any other party approved by you.

We do not disclose personal information to anyone else except as set out above. All third parties that we share data with are required by their own data sharing agreements or contracts to treat your data as carefully as we would, to use it only as instructed, and to allow us to check that they do this.

HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement or other legitimate reason to keep your information longer we retain relevant physical and electronic records for a period of up to 6 years after your last contact with us.

Exceptions to this rule are:

• Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have been involved with us.

The personal information retained will be minimised to the information required for the purposes for which it is retained. Full details of our retention periods, what personal information is retained and our justification for doing this can be found in our data retention schedule.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You can update some of the personal information we hold about you by using the details set out in the "Contacting us" section below.

Your personal data will also be available to any groups to which you register and will be retained by them in accordance with their privacy notice.

USING YOUR INFORMATION FOR MARKETING

We only send marketing information that is not included in any contract you have with us or where we do not have a legitimate interest to do so to you if you have explicitly agreed to our doing so or have requested it and we will only do so in the way(s) you have agreed to. You can withdraw consent at any time.

Marketing information includes information about tickets to events, special offers, opportunities, products and services and other commercial information.

If you want to receive marketing information from the IPSF or information from us about our partners but haven't yet requested it, you can do so by emailing info@polesports.org or updating your preferences in your online preference centre.

If we contact you by email with marketing information, every message we send will include a link to opt out of receiving future marketing messages if you change your mind. If we contact you by other means and you want to change how, or if, you receive our marketing communications, please email info@polesports.org or update your marketing consents in your online preference centre.

CHILDREN

Children's data are collected and processed in accordance with the information in this privacy notice. Parents and guardians are expected to ensure that the children they are responsible for are aware of how their personal data will be processed by us.

We require parental or guardian consent to process personal data of any child under the age of 14.

TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction where you are resident. We will take all reasonable steps to ensure that your personal information is used only in accordance with this privacy notice and applicable data protection laws and is respected and kept secure. Where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws.

International organisations we work with include:

SNAP Surveys is used to facilitate the sending of surveys. Snap WebHost runs on Rackspace UK servers, and data are held on servers in the UK. This is accessible by Snap Surveys staff based in both the UK and the US. Snap US subsidiary is certified under the EU-US and Swiss-US Privacy Shield which is approved by the EU in relation to data protection practices. In rare technical support circumstances and to provide 24/7 cover, support agents working for Rackspace who are based outside of the European Economic Area may access the servers. They have included EU Model Clauses in their contract with Rackspace to apply their protections to any potential transfers of personal data in those circumstances.

Dropbox is a secure online file sharing and storage platform. It may store, process and transmit information in the United States and locations around the world. Information may also be stored locally on the devices used to access the Services. Dropbox complies with the EU-US and Swiss-US Privacy Shield which is approved by the EU in relation to data protection practices. Their registration can be reviewed on the Privacy Shield website www.privacyshield.gov/list.

Wufoo is used to facilitate the sending of surveys and application. Wufoo subscribes to the EU-US Privacy Shield which is approved by the EU in relation to data protection practices. Their registration can be reviewed on the Privacy Shield website www.privacyshield.gov/list.

Google Cloud Platform is used for Google Docs. Google Cloud Platform subscribes to the EU-US Privacy Shield which is approved by the EU in relation to data protection practices. Their registration can be reviewed on the Privacy Shield website www.privacyshield.gov/list.

INFORMATION SECURITY

Where we have given you (or where you have chosen) a password, which enables you to access certain parts of our website, Thinkific administration portal or other IT systems, it is your responsibility to safeguard your password against the possibility that others may use it to gain unauthorised access. Do not store your password anywhere, in written or electronic form, or give it to someone else. Please let tutor@polesports.org know if any record containing your password is lost or stolen or if you think there has been a possibility that your security has been breached.

We do our very best to keep personal information secure wherever we collect personal data. We place a great importance on the security of all personally identifiable information associated with our members, supporters, customers and users. We will take all steps reasonably necessary including policies, procedures and security features to ensure that information about you is treated securely and protected from unauthorised and unlawful access and used in accordance with this privacy notice. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal data under our control or being transferred, we use our best efforts to try to prevent this.

Our website may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

WHAT WE DON'T DO WITH YOUR INFORMATION

We never sell or share your information with other organisations to use for their own purposes.

YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at https://ico.org.uk/for-the-public/.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

The IPSF is not a 'public authority' as defined under the Freedom of Information Act and we will not therefore respond to requests for information made under this Act.

CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email our Data Protection Lead: info@polesports.org.

Version dated 05/01/2020