



Tri20 Triathlon Club Limited

Data Protection Policy

(formerly the Privacy Policy)

1. Introduction

This Data Protection Policy sets out our commitment to protecting your Personal Data and how we implement that commitment. It tells you how we handle your Personal Data and the rights you have when we hold it and describes how we intend to comply with the General Data Protection Regulation EU 2016/679 (GDPR).

2. Who are we?

Tri20 Triathlon Club Limited, Company number 10609768. Our registered company address is:

27 Old Gloucester Street
London WC1N 3AX

We are the “Data Controller” for the purposes of GDPR. This means that we decide how your Personal Data is processed and for what purposes.

3. Your Personal Data – what is it?

Personal Data is data that relates to a living individual who can be identified from that data. We might be able to identify you from the data itself or by linking that data to other information we have access to. Your email address, telephone number and date of birth are examples of Personal Data.

GDPR also defines a special category of Personal Data as Sensitive Personal Data. Sensitive Personal Data includes health-related data.

GDPR tells us how we must process your Personal Data and Sensitive Personal Data.

4. How do we process your Personal Data?

We comply with our obligations under GDPR in the following ways:

- by protecting Data from loss and misuse and from unauthorised access and disclosure
- by keeping Data up to date – *this relies on you telling us when something changes*
- by deleting Data when we no longer have a reason to store it
- by not collecting or retaining Data which we do not need for Club or government administrative purposes.



5. What do we use your Personal Data and Sensitive Personal Data for?

5.1 We collect and hold your Personal Data to:

- a) Manage your membership information and process payments for Tri20 membership
- b) Provide you with our Members' Handbook and newsletter
- c) Inform you of events, activities, training sessions or triathlon-related services or races which we think you may be interested in hearing about
- d) Enable us to provide the contact details of members attending our training sessions or events for COVID-19 track and trace purposes when requested to do so by a representative of the government, NHS or local council, or someone acting on their behalf.

5.2 We collect and hold your Sensitive Personal Data to:

- a) Inform coaches of any medical conditions that might impact your ability to train or that could be relevant if you had an accident or were taken ill at a Club training session
- b) Confirm that you are not experiencing symptoms of COVID-19 infection and have not been in contact with anyone who has symptoms or a confirmed infection in the last 14 days prior to booking to attend a group training session, ride or event.

We also hold the personal details of the person that you have advised should be contacted if you are injured or unwell during a Club training session, group bike ride or event and unable to contact someone yourself.

6. What is the legal basis for us processing your Personal Data and Sensitive Personal Data?

When you joined Tri20 you were asked to consent to the Club collecting and using your Personal Data for the purposes given in Section 5.1, points a) to c) above. When your membership is renewed via ClubSpark you will be asked to consent to the collection of Sensitive Personal Data, and the additional uses of your Data that are given in Section 5.1, point d), and in Section 5.2 above.

New members will be asked to consent to the collection and use of their Personal and Sensitive Personal Data as described in this policy when they log in to ClubSpark for the first time.

You can view this policy on our website, on the members only page, or request it by contacting secretary@tri20.club. You can view the uses of data that you consented to by logging into your membership account.

You always have the right to refuse to give us any information, particularly sensitive information.

7. How long do we keep your Personal Data and Sensitive Personal Data?

We keep your Personal Data and Sensitive Personal Data for as long as you are a member of the Tri20 Triathlon Club. After you leave, we will delete your information as of the date of leaving. If you do not renew your annual membership and we have not heard from you in the 3 months after renewal was due, we will assume that you have left the Club and will delete your information.



8. Your rights and your Personal Data and Sensitive Personal Data

You have the following rights with respect to your Data:

- The right to request a copy of the Data which we hold about you, without any charge
- The right to request that we correct any Data found to be inaccurate or out of date
- The right to request that your Data is erased where it is no longer necessary for us to keep it
- The right to withdraw your consent to the processing we carry out, at any time
- The right, where there is a dispute in relation to the accuracy or processing of your Data, to ask us to restrict further processing
- The right to object to the processing of Personal Data
- The right to lodge a complaint with the Information Commissioner's Office (ICO) and to seek legal recourse.

9. Further processing

If we wish to use your Personal Data for a new purpose not covered by this document, we will provide you with a notice explaining this new use. We will do this before we start processing for the new use. We will set out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

10. Contact details

If you have a problem, complaint or, if there is something you don't understand, please contact us first using the following email address or by writing to us at our registered address:

Email: info@tri20.club

Tri20 Triathlon Club Ltd
27 Old Gloucester Street
London WC1N 3AX

You can contact the Information Commissioner's Office (ICO) on 0303 123 1113 or via email using the form at the following link <https://ico.org.uk/global/contact-us/email/> or by writing to:

Information Commissioner's Office

Wycliffe House
Water Lane Wilmslow
Cheshire SK9 5AF