

Active Skills for Life Privacy Policy

This privacy notice tells you what to expect when Active Skills for Life (ASfL) processes your personal information

How we use your information

Active Skills for Life is powered by British Triathlon

British Triathlon Ltd. trading as Triathlon England on behalf of ASfL will be a "controller" of the personal information that you provide to us through this website, unless otherwise stated.

This privacy notice applies to information ASfL collects about Subscribers/Partners details below:

- Those who register for a:
 - Active Skills for Life Engage Subscription
 - Active Skills for Life Enhance Subscription
 - Active Skills for Life Franchise or Franchise+

For the above, we process personal information including:

- personal details - such as name, address, email addresses, telephone numbers, date of birth, account password.
- profiling details - for example where you heard about ASfL what type of organisation you are, what content you would like.
- payment details - credit/debit card details (which we do not retain) and other payment details such as bank account number, sort code, card details so we can receive payments from you and details of the financial transactions with you;
- marketing communication preferences - so that we know whether and how we should contact you.
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance in the ASfL Award via moodle log in and face-to-face course sign up and attendance.

How we collect personal data

We may collect your personal information in a number of ways, principally:

- Directly from you, for example when you purchase a membership/partnership.
- On rare occasions, we may receive information about you from others who are not acting on your behalf (for example, where someone makes a complaint about you which we then investigate)

Why we need your personal information - contractual purposes

We need to process our ASfL Subscribers/Partners personal information so that we can manage your Subscription/Partnership. We will use personal information to:

- provide you with ASfL services, including fulfilment of resources and training.
- set up your online ASfL training account and administer your account online;
- send you communications by post or email in relation to essential services, including but not limited to, renewals, information and ASfL benefits;

If you do not provide us with all of the personal information that we need to collect then this may affect our ability to offer the above ASfL services and benefits.

Why we need your personal information - legitimate interests

We also process our ASfL Members/Partners personal information in pursuit of our legitimate interests to:

- monitor and develop participation in the sport by monitoring engagement and participation in ASfL and inviting holders to participate in surveys for researching and development purposes;
- respond to and communicate with holders regarding your questions, comments, support needs or complaints, concerns or allegations in relation to ASfL. Complaints will be dealt with in line with the Triathlon England complaints process. We will use your personal information to investigate your complaint, to suspend your membership/partnership, take disciplinary action;

Where we process your personal information in pursuit of our legitimate interests, you have the right to object to us using your personal information for the above purposes. If you wish to object to any of the above processing, please contact us on dataprotection@britishtriathlon.org. If we agree and comply with your objection, this may affect our ability to undertake the tasks above for the benefit of you as a ASfL Member/Partner .

Why we need your personal information - legal obligations

We are under a legal obligation to process certain personal information relating to our ASfL Members/Partners for the purposes of complying with our obligations under:

- the Companies Act 2006, to maintain a register of our pass holders, which includes our pass holders name, address, the date they were purchased their Beyond Swim pass and the date on which they ceased to hold a pass and hold general meetings, including issuing notices and voting arrangements;
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

Why we need your personal information - consent

We use consent as the legal basis to:

- send out marketing communications to promote and encourage participation in ASfL which include monthly newsletters, promotions and offers from official sponsors and partners;

Who we share your personal information with

We may be required to share personal information with statutory or regulatory authorities and organisations to comply with statutory obligations. Such organisations include the Health & Safety Executive, Disclosure & Barring Service, and UK Police and law enforcement agencies for the purposes of prevention and detection of crime.

We may also share personal information with our professional and legal advisors for the purposes of taking advice.

Triathlon England on behalf of ASfL may share personal information with companies who help with fulfilment of resources. For example Triathlon England currently employs Scimitar to provide the printing and distribution of ASfL packs.

Your data may be shared with data processors to help with communication delivery. For example, we use a third party provider, MailChimp, to deliver some of our email communications which might include e-newsletters and direct marketing emails. Your data may be shared when we may use data processors to conduct online surveys (for example SurveyMonkey) so that we can report on trends and gain feedback; or with companies who provide cloud-based file storage and sharing like Dropbox and Sharepoint.

We will pass some personal data on to our payment providers in order to take payment for your Membership/Partnership. This generally includes payment details along with name, address and contact details which are sometimes used in fraud prevention.

If we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with ASfL services. Unless you ask us not to, we will review and possibly delete your personal information where you have not renewed your ASfL Membership/Partnership with us for six years.

We will keep certain personal information of members for longer in order to confirm your identity, when you were a ASfL Member/Partner and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of ASfL Members/Partners or in the event of a claim against Triathlon England.

Transferral of personal data outside the European Union

Your personal data may be transferred outside of the EU when using third party services such as Dropbox, MailChimp or SurveyMonkey. Whenever your data is transferred outside the EU we will make sure the organisation receiving the personal data has provided adequate safeguards. For example, Dropbox and MailChimp participate in and has certified their compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework. Your personal data may be transferred outside of the EU when using third party services such as Dropbox, MailChimp or SurveyMonkey. Whenever your data is transferred outside the EU we will make sure the organisation receiving the personal data has provided adequate safeguards. For example, Dropbox and MailChimp participate in and has certified their compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework.

Your rights

Under the Data Protection Act 1998 and General Data Protection Regulation, you have rights as an individual which you can exercise in relation to the information we hold about you. You can read more about these rights at <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>.

Your rights include:

- your right to request access to the personal information that we hold about you by making a subject access request;
- if you believe that any of your personal information is inaccurate or incomplete, you have a right to request that we correct or complete your personal information;
- your right to request that we restrict the processing of your personal information for specific purposes; and
- if you wish us to delete your personal information, you may request that we do so.

Access to personal information

Triathlon England on behalf of ASfL tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request'. If we do hold information about you we can:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

To make a request to Triathlon England for any personal information we may hold, please contact us on the contact details provided below or by emailing dataprotection@britishtriathlon.org.

If we do hold information about you, you can also ask us to correct any mistakes by contacting us or correcting it yourself within your [My Account](#).

Complaints or queries

British Triathlon Ltd. trading as Triathlon England on behalf of ASfL tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. Please contact us using the contact details provided further down this page.

You also have the right to lodge a complaint with a supervisory authority, which, in this instance, is the Information Commissioner's Office (ICO). If you want to make a complaint about the way we have processed your personal information, you should do so on the ICO website: <https://www.ico.org.uk/concerns>.

Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

We keep our privacy notice under regular review. This privacy notice was last updated on 3 August 2018.

How to contact us

If you want to request information about our privacy policy you can email us at dataprotection@britishtriathlon.org or write to:

Data Protection
British Triathlon
PO Box 25
Loughborough