

# Privacy Policy

## **About this policy**

This Policy describes how we use your personal data when you enter either or both of (i) the 'ITU World Triathlon Leeds' or (ii) the 'ITU World Triathlon Mixed Relay, Nottingham' events to be held in 2019 including the mass participation races ('the Events'). We have adopted this Policy to ensure that we are compliant with all relevant Data Protection laws, and we have published it here so that you understand what personal data we may collect and hold about you, how we may use it and why, and how we keep it safe. You have legal rights to access your personal data and to control how we use it, which are also explained in this Policy.

Please read this Policy carefully and in full which covers the following:

- *Who we are and how you can contact us*
- *What personal data we collect about you*
- *What we use your personal data for*
- *'Consent' and other legal grounds for processing your personal data*
- *Personal data you are legally obliged to provide*
- *Your rights to know what personal data we hold and to control how we use it*
- *Automated decision making and profiling*
- *When we will share your personal data with others*
- *How we keep your personal data safe*
- *How we use your personal data for marketing*
- *Event photography and use of images*
- *When we will send your personal data to other countries*
- *How long we keep your personal data*
- *How you can make a complaint*

## **Who we are and how you can contact us.**

We are the British Triathlon Federation ('BTF'), a not-for-profit company (company number 02995438) limited by guarantee that acts as the national governing body for the sport of Triathlon, and associated multi-sports, within Great Britain. Our registered office address is at PO Box 25, Loughborough University, Loughborough, Leics, United Kingdom.

You can contact us in writing to us via our registered office or by emailing [dataprotection@britishtriathlon.org](mailto:dataprotection@britishtriathlon.org). If you would like to speak to us please call us on 01509 226161 or write to:

Data Protection  
British Triathlon  
PO Box 25  
Loughborough  
LE11 3WX

## **What personal data we collect about you.**

We collect:

- **Personal data that you provide to us as part of the online Event entries process.** This is all the data you submit via the online registration portal, which is powered by software and other technology licensed from Active Network, LLC ("Active"). This will include the following (subject to the requirements of the entries system and your preferences):
  - Personal details – name, address, gender, email address, and date of birth
  - Emergency contact details – name, contact number
  - Details of any disability
  - Relevant medical conditions
  - British Triathlon Home Nation Membership details including club membership details
  - Payment details
  - Keeping in touch contact preference

- Active lifestyle information
- Ethnicity details
- **Personal data that we receive from third parties we work with.** Putting on major sport events is a complex operation. In order to put on the Events we rely on working together with other businesses and contractors who will collect personal data about you in the course of their work on the Events which they share with us. These partners and contractors included the following:

<b>Name/description of contractor or partner</b>	<b>Contractor/partner role</b>	<b>Personal data provided by contractor/partner</b>
Our Race Timing provider	To capture electronic race timings and compile a results table, with a breakdown of intermediate timings or 'splits'.	Race results and times; ranked based on performance.
Photographers and Videographers (appointed by the BTF)	To capture still and moving images from the Events.	Potentially your image.
Our TV production company and official broadcaster	To record and broadcast to a wide national and international audience live and delayed film of and from the Events	Potentially your image.
United Kingdom Anti-Doping Agency	To provide anti-doping services and information to the Events	Potentially information about past doping offences and/or information that might suggest that you are at risk of committing an anti-doping rule violation at the Events

- **Personal data we receive from other third parties.** We may be provided with details about you by other parties such as your triathlon or other club, or another individual, for example a team mate who is registering you as part of a relay team. We ask clubs and/or individuals (and others that might supply personal data) to make sure that they have checked that you are happy for them to share this information before they pass it on to us.

### **What we use your personal data for**

We have provided a detailed description of the different ways we use your personal data in a table at the Schedule appearing at the end of this Policy. The bullet point list below gives a general overview of the main reasons we use your personal data:

- to run and administer the Events,
- to ensure you receive merchandise and services you have ordered in connection with the Events,
- to provide you with marketing information in accordance with your marketing preferences (see **How we use your personal data for marketing**),
- to manage and administer our business generally in relation to the Events, and
- to review and improve the Events.

### **'Consent' - and other legal grounds for processing your personal data**

Whilst we always want you to be aware of how we are using your personal data, this does not necessarily mean that we are required to ask for your consent before we can use it. Data Protection laws and regulations provide a number of basis's on which personal data might be lawfully processed. In putting on the Events, we may use your personal data without asking for your consent on the following grounds:

- we are entering into and carrying out our obligations under a contract with you (i.e. the contract whereby you enter, and BTF accepts your entry, into the Events pursuant to the Event Terms & Conditions. These Event Terms and Conditions are available at the point of entry and form a separate contract that should be read alongside and in conjunction with this Policy,
- we need to use your personal data for our own legitimate purposes (such as the administration and management of our business and the improvement of our the

Events and future events) and our doing so will not interfere with your privacy rights,

- we are subject to legal obligations that require us to use your personal data in certain ways (such as disclosing information to HM Revenue & Customs for withholding tax purposes on earnings from non-UK elite competitors), and
- we are seeking to protect your vital interests (i.e. to ensure that you receive appropriate medical care if you are involved in an accident whilst competing).

The most common situation in which we will process your personal data on the grounds of consent is where we wish to send marketing communications to you. Please refer to the section below on '**How we use your personal data for marketing**' to understand our marketing practices.

In exceptional circumstances we may wish to use your personal data for a different purpose to the one we originally collected your personal data for (so there might then be a different lawful basis for processing the data). In these circumstances we will contact you to explain how we wish to use your data and to ask for your consent.

You are never required to give consent just because we ask for it, and if you do give your consent you can change still your mind and withdraw it at a later date.

If you want to understand the legal grounds we rely on when we use your personal data for different purposes in more detail please refer to the table in the Schedule at the end of this Policy.

### **Personal data you are legally obliged to provide**

You are not under a legal obligation to provide us with any of your personal data but please note that if you elect not to provide us with the personal data we ask for on the entries portal may be unable to enter you in the Events or (if we can still enter you), supply additional services or merchandise that you enquire about or order.

### **Your rights to know what personal data we hold and to control how we use it**

You have a legal right to know what personal data we hold about you - this is called '*the right of subject access*'. You can exercise this right (or any of the other rights described below) by sending us a written request at any time. Please mark your letter "**Data Subject Request**" and send it to us at our registered office or by email to [dataprotection@britishtriathlon.org](mailto:dataprotection@britishtriathlon.org)

You also have rights to:

- prevent your personal data being used for marketing purposes (see **How we use your personal data for marketing** for further details),
- have inaccurate personal data corrected, blocked or erased,
- object to decisions being made about you by automated means or to your personal data being used for profiling purposes,
- restrict our use of your personal data (but note that this might impact our ability to permit you to race, or to provide you with goods, services or support that would otherwise be available),
- require that we delete your personal data (the “right to be forgotten”), and
- require that we provide you, or anyone that you nominate, with a copy of personal data you have given us in a structured electronic form such as a CSV file (spread-sheet or other common file format).

You can find full details of your personal data rights on the Information Commissioner’s Office website at [‘www.ico.org.uk’](http://www.ico.org.uk).

### **Automated decision making and profiling**

We do not make use of automated decision making or profiling.

### **When we will share your personal data with others**

We may share your data with the following people as a routine part of our management, delivery of your event purchases and organisation of the Events:

- The ITU, Triathlon England, Welsh Triathlon, Triathlon Scotland
- The business partners, sponsors, suppliers and sub-contractors we work with to put on the Events. This includes:
  - British Bike Hire,
  - Merchandise partners,
  - Event medics and first responders,
  - Event photographers

- advertisers and advertising networks (see **How we use your personal data for marketing** for more information)
- UK Anti Doping Agency
- HMRC
- Event timing and results supplier
- Medal Engravers- ITAB
- Grandstand Tickets fulfilment provider: Leeds Box Office & Gigantic
- Insurance provider (Yellow Jersey)
- Event accredited media, photographers and videographers
- Nirvana Europe – for travel and accommodation options
- Mailchimp for bulk email service offering
- Dropbox to store your data safely
- Security company to ensure safety of competitors, spectators and equipment
- Technical officials for application of the Sport Technical rules
- Third party payment providers, for settlement of purchases from BTF
- ITU – International Triathlon Union
- Active Network LLC – please note that as our online entries system partner Active will process your personal data under a Data Processing Agreement with us; this agreement fully complies with Art. 28 of GDPR. IN ADDITION, and separately, because you will create an account with Active when you enter the Events, Active will control your data for their account management purposes pursuant to the terms of their own Privacy Policy (see current version as at 20 September 2018 <http://www.activenetwork.com/information/privacy-policy>). It is very important to understand that BTF can only manage, protect and control your data when it is used for the purpose of our Events. When it is used outside the Events, as part of the Active account management process, you will be governed by Active's data protection agreement, or privacy policy.

We may also share your personal information with third parties on a 'one-off' basis, for example, if:

- You are involved in an accident or incident and we need to pass your details to our insurers
- we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Event Terms and Conditions or other agreements we have with you, or to protect the rights, property, or safety of our members, event competitors and marshals, ourselves or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and to detect possible cheating, including suspected doping offences.

### **How we keep your personal data safe**

We take every care to ensure that your personal data is kept secure. The security measures we take include:

- only storing your personal data on our secure servers and permitting Active to store the data on their secure servers subject to our Data Processing Agreement with them (note that your personal data is also used by Active and controlled by Active's Privacy Policy under the terms of the Active account you will have set-up with them),
- ensuring that our staff receive regular data security awareness training,
- keeping paper records to a minimum,
- maintaining up to date firewalls and anti-virus software to minimise the risk of unauthorised access to our systems,
- having adopted our policy on the use of mobile devices and out-of-office working, and
- password protection where appropriate and available and encryption of data held on computer hard-drives and other fixed storage devices.

Please remember that you are responsible for keeping your own passwords secure and confidential. Please do not to share your passwords with anyone.



Unfortunately, sending information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of personal data in transit via the 'web; therefore you agree to send us personal data at your own risk. Once we have received your personal data, we will use strict procedures and security features (some of which are described above) to try to prevent unauthorised access to it, or inappropriate use of the data.

### **How we use your personal data for marketing purposes**

We will add your details to our marketing database if you opt-in to receiving marketing communications from us during the Event sign up process. We will respect the various choices you opt for in terms of the type of information you wish to receive (if any).

We may send you marketing communications by email, telephone (including automated calls), text message, post or via social media advertising networks.

You can check and update your current marketing preferences at any time by calling or emailing us using the details set out in the **Who we are and how you can contact us** section above.

We will include clear instructions on how you can opt-out of receiving further marketing communications or update your preferences in every marketing communication we send you.

### **Event photography and use of images**

Please note that the Events take place in public spaces and on the highways, images from the Events (including your image) may be collected during Events by media agencies and members of the public that the BTF does not control and has not authorised. Therefore the collection of images by these third parties is outside our control and you must speak to those agencies directly if you have concerns.

We will authorise the taking of photographs, moving images, and the filming of the Events for different purposes connected to the Events e.g. sale of event images to competitors, use on marketing, website, social media etc., and for the broadcasting and live streaming of the Events on the BBC and via our agreement with ITU, the ITU official website and streaming service, and national broadcasters outside the UK that have agreements with the ITU to show ITU series events.

We cannot stop images of specific individuals being captured during the Event by the official channels, but we will endeavour to control the use of these images if you

object to your image being used in any way that causes you loss or damage or otherwise infringes your rights.

You may (1) notify us in advance of your race number asking that images captured are searched and deleted - and (2) notify us if you subsequently see an image of yourself that you consider causes you loss or damage or otherwise infringes your rights asking that it or they be removed. The BTF will, on a case by case basis, use its reasonable efforts to comply with your request, but note that individuals must be identifiable to the BTF and that we are not obliged to remove images of an individual where he or she is not the main or a dominant feature of the image e.g. spotting your own face in an image of a mass swim start would not entitle you to deletion.

### **When we will send your personal data to other countries**

Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") by us or by our sub-contractors. Where we, or our sub-contractors, use IT systems or software that is provided by non-UK companies, your personal data may be stored on the servers of these non-UK companies outside the EEA. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

The table below shows how your personal data may be transferred outside of the EEA and the safeguards that are in place:

<b>Processor or recipient</b>	<b>Destination</b>	<b>Reason for transfer</b>	<b>Data involved</b>	<b>Safeguards</b>
Active Network LLC	USA	Active Network provide the event booking and management system used by the BTF.	All data provided during the event entry process.	Active Network LLC is registered with the EU-US Privacy Shield.
Dropbox	USA	Data transfer and sharing required to administer the Events	Data transfer and sharing permitted by this Policy	Registered with the EU-US Privacy Shield

Mailchimp		Data transfer and sharing required to administer the Events	Data required to communicate to entrants.	EU-U.S. Privacy Shield Framework and the Swiss-U.S Privacy Shield Framework
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### **How long we keep your personal data**

We only keep your personal data for as long as we actually need it. In practice this means that we will keep your personal data for no more than 7 years, EXCEPT that race results and photos will be kept indefinitely for archival and record purposes.

Please note that we may anonymise your personal data or use it for statistical or research purposes. We may keep anonymised and statistical data indefinitely but we take care to ensure that such data can no longer identify or be connected to you or any individual.

If you have any questions about our data retention practices please contact us using the details in the **Who we are and how you can contact us** section.

### **How you can make a complaint**

If you are unhappy with the way we have used your personal data please contact us to discuss this using the contact details set out in the **Who we are and how you can contact us** section above.

You are also entitled to make a complaint to the Information Commissioner's Office which you can do by visiting [www.ico.org.uk](http://www.ico.org.uk). Whilst you are not required to do so, we encourage you to contact us directly to discuss any concerns that you may have and to allow us an opportunity to address these before you contact the Information Commissioner's Office.

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### **Schedule - Table referred to above regarding the data collected, the use of that data and the lawful basis for using it**

<b>Categories of personal data used</b>	<b>Purpose</b>	<b>Legal basis</b>
<p>Personal details entered on the entry process including name and contact details.</p>	<p>To respond to your request to enter the Event and relevant enquiries regarding the Event and other similar events organised by us. To manage our relationship with you e.g. to keep your details up to date and notify you of any changes to our contractual documents or privacy policies. To send you appropriate marketing communications in accordance with your marketing preferences. To fulfil your merchandise orders. To publish official start and results lists, live timing and streaming.</p>	<p>Legitimate interest in growing our sport and developing new participants who compete in triathlon and live active lives; and/or contractual necessity in order to fulfil the Event Terms and Conditions; and or legal obligation to maintain up to date and relevant (accurate) information; and consent according to your marketing preferences. To improve the Event and future events. To administer the anti-doping programme. To fulfil your merchandise orders requested at the point of entry. To publish official start and results lists, live timing and streaming.</p>
<p>Financial information, transaction history</p>	<p>To provide you with the goods and services you wish to buy from us (such as Event entry fees, merchandising and insurance – if selected) and to collect money owed to us</p>	<p>Contractual necessity and/or legitimate interests (to recover monies due to us) and to fulfil your order, provide the services you require and to detect and prevent fraud. For elite level athletes we must report earning from the Event to HMRC for</p>

		withholding tax purposes.
Personal details – name, address, gender, and date of birth	To be able to comply with the sports technical rules.	Contractual necessity and/or legitimate interests (to ensure that you compete in the correct races according to your personal characteristics and the sport technical rules.
Emergency contact details – name, contact number	In order to inform relevant people if you have an accident or become ill	To protect and secure your vital interests and those of your family and friends. Consent and/or legitimate interests (to permit us to protect your welfare and inform others of your condition)
Active lifestyle information	To assess the degree to which the Event contributes to the wider objectives of the BTF and Sport England	Legitimate interests of a National Governing Body for Sport, in receipt of funding. To better engage with you and the general public regarding the benefits of exercise.
British Triathlon Home Nation Membership details including club membership details	To assess the degree to which the Event contributes to the wider objectives of the BTF and Sport England. To be able to report on participation numbers to the various Home Nations.	Legitimate interests of a National Governing Body for Sport, in receipt of funding.
Details of any disability and Relevant medical conditions	To ensure that your health and safety are respected and that within the	Legitimate interest is to comply with relevant legislation, the Sport Technical rules and our

	resources and the law we make adjustments appropriate to you.	contract with you.
Ethnicity details (if you chose to disclose and share this information)	To ensure that the Event, other events and the Sport are open to all.	Legitimate interests of a National Governing Body for Sport, in receipt of funding.
Marketing contact preferences (keeping in touch)	<p>To send you marketing communications from:</p> <ul style="list-style-type: none"> <li>- To tell you about all our ITU World Triathlon Series events and products and service this year and in the future.</li> <li>- To tell you about British Triathlon's GO TRI programme.</li> <li>- To tell you about British Triathlon Home Nation membership and products and services.</li> <li>- To send out marketing and communications from our Event Commercial Partners, Sponsors, and Suppliers.</li> <li>- To share your race details with our appointed Event Photography Company to ensure you receive access to purchase your</li> </ul>	<p>Consensual purposes on the entry form to inform you on marketing opportunities of interest.</p> <p>You can update your preferences at anytime as outlined in this policy.</p>

	post race photos/ videos.	
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