

Privacy Policy

About this policy

This Policy describes how we use your personal data when you sign up to receive marketing information from British Triathlon at face to face pop-up promotional activity, marketing activation and when we collect photo or video content for promotional purposes. This policy applies to Popup events that relate to British Triathlon products and major events, ITU World Triathlon Leeds and ITU World Triathlon Mixed Relay Nottingham. 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*
- *How we keep your personal data safe*
- *How we use your personal data for marketing*
- *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. 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 at the point of sale or photo/ video consent form.**
 - Personal details – name, address, phone number, email address
 - Active lifestyle information
 - Marketing preferences

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 gain your consent to use your imagery/ videography/ recording for promotional purposes,
- to provide you with marketing information in accordance with your marketing preferences (see **How we use your personal data for marketing**),

‘Consent’ - and other legal grounds for processing your personal data

In collecting your data, we will process your personal data on the grounds of consent. This is where we wish to send marketing communications to you and to use still and moving images of you in promotional material to promote our events. Please refer to the section below on ‘**How we use your personal data for marketing**’ to understand our marketing practices.

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.

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

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 share marketing information with you.
- 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.

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 Mailchimp servers which meets the appropriate standards,
- ensuring that our staff receive regular data security awareness training,
- keeping paper records to a minimum and destroying your completed form once saved electronically,
- 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.

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. 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.

We may use your image, voice or moving images in promotional material.

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.

Photography and use of images

By completing our Photography, Filming and Recording Consent Form, you agree that we can use the content collected for the purposes outlined on the form.

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:

| Processor or recipient | Destination | Reason for transfer | Data involved | Safeguards |
|-------------------------------|--------------------|---|--|---|
| 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 |

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.

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. 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.

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

| Categories of personal data used | Purpose | Legal basis |
|--|--|--|
| Personal details entered on the online sign-up form. | To send you appropriate marketing communications in accordance with your marketing preferences. To tell you about all our | Consent received at the point of sign up to share marketing information. |

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|---|---|---|
| | <p>ITU World Triathlon Series events and products and service this year and in the future.</p> <p>To tell you about British Triathlon's GO TRI programme locally.</p> | |
| <p>Personal details and images, moving images and voice recordings.</p> | <p>To use these for creating promotional material for our ITU World Triathlon Series events.</p> | <p>Consent given via form to share these elements of personal data.</p> |