

# **Swim Bike Run Privacy Notice**

## About us

Swim Bike Run is a product of the British Triathlon Federation, whose members are the Home Nation's Associations of Triathlon England, Triathlon Scotland, and Welsh Triathlon. Swim Bike Run is only delivered in England.

British Triathlon Federation (hereafter referred to as "Swim Bike Run") will be a "data controller" of the personal information that you provide to us when interacting with this website, or taking part in Swim Bike Run activities, unless otherwise stated.

We are committed to protecting your privacy, and this privacy notice has been designed to inform you of how we process your personal data, as well as the rights that you have and how you can exercise them.

## What personal data do we collect and use?

When you interact with any of our Swim Bike Run products, we will ask you for the following personal information:

To sign up to a Swim Bike Run activity on the Swim Bike Run website:

- contact details full name, phone number, full address, email address, and date of birth
- payment details bank account number, sort code, card details
- emergency contact details
- equality information disability (if any), ethnic group, religious belief;
- gender identity and sexual orientation;
- · disability/long term health conditions and short term medical conditions

Please note when linking a child's account to a parent account, the same email address and password must be used but the personal details must be specific to each individual's account.

When you use our Swim Bike Run App:

• We have created a separate privacy notice for users of the App that you can access here.

We may also process information such as the IP address and user agent you are using to access the website.



## Purposes for processing and lawful bases

We process your personal data for a number of different purposes. For each purpose, we have identified a lawful basis for processing.

**Contract** - we need to collect our Swim Bike Run participants' personal information so that we can manage your registration and ensure that you are able to take part in the activities you have signed up to and paid for. We will use this personal information to:

- send you service messages by email, SMS and post in relation to essential Swim Bike Run communications, including but not limited to, changes to Swim Bike Run and in particular the activity onto which you have registered, activity fees information and information on Swim Bike Run benefits. Please note: if your child's account is linked to your account, you will receive emails for each individual account
- process payment for activities that you have signed up to and paid for
- send you communications about the events and activities that you have signed up to

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 Swim Bike Run services and benefits.

**Legitimate Interests** – We also process our members' personal information in pursuit of our legitimate interests to:

- promote and encourage participation in the sport of Triathlon by creating content. Our competitions and events may be filmed for live streaming purposes and your personal information may also be used in images captured from our competitions and events, which we use for promotional, education and development purposes;
- to undertake surveys, to better understand who is participating in our Swim Bike Run events and sessions and how we may be able to improve our events and sessions.
  We will use responses to our surveys to produce anonymised aggregated reports which are used internally by British Triathlon Federation and Home Nations and shared with Sport England.
- invite our members as award winners or guests to our awards ceremony which includes asking our Swim Bike Run members to nominate individuals for awards and shortlisting such individuals to select the winners, who we will then contact by email;
- respond to and communicate with members regarding your Swim Bike Run questions, comments, support needs or complaints, concerns, or allegations in relation to the sport of Triathlon. Complaints will be dealt with in line with the British Triathlon complaints process. We will use your personal information to investigate your complaint, to suspend participation and, where necessary, take disciplinary action; and
- help maintain the security and performance of our website.

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 <u>dataprotection@britishtriathlon.org</u>. 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 member.



**Legal Obligation** – We are under a legal obligation to process certain personal information relating to our participants for the purposes of complying with our obligations under:

- the Companies Act 2006, to maintain a register of our participants, which includes our participants' name, address, the date they were joined our database and the date on which they ceased to be our participant.
- our Sport England regulatory requirements to report on the size, achievements and profile of our participants; and
- the Equality Act 2010, which requires us to process personal information to make reasonable adjustments where necessary.

**Consent** – In some circumstances, we may ask you for your consent to process your personal data. This is usually to:

- send you direct marketing messages via SMS or email including monthly newsletters, Swim Bike Run updates, Swim Bike Run activity promotions, and offers from official sponsors and partners; and
- use marketing and analytics cookies on our website.

### Other uses of your personal information

We may ask you if we can process your personal information for additional purposes. Where we do so, we will provide you with an additional privacy notice with information on how we will use your information for these additional purposes.

#### Special categories of data

Where we collect particularly sensitive personal data (such as information about your health, ethnicity, and sexual orientation), alongside a lawful basis we have identified an additional condition for processing as required by law.

• We use our participants' personal information relating to your disability (if any), ethnic group, religious belief, gender identity and sexual orientation for equality monitoring purposes as required by Sport England. We will process such personal information through aggregated and anonymised reports to identify and keep under review the existence or absence of equality of opportunity or treatment between groups of people within the same categories to promote or maintain equality of opportunity and treatment within our sport.

#### Who we share your personal information with

We may share the data you provide us with the following types of organisations:

- Carefully selected third party data processors that process personal data on our behalf. For example, we use Trust Payments to process your online payments, Microsoft Outlook to respond to your queries, and Dot Digital to manage Swim Bike Run communications.
- If your personal information is included in any images or videos taken by us at our competitions and events, we may share this with Sport England for promotional and/or journalistic purposes.
- 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 for the purposes of safeguarding children.
- We may also share personal information with our professional and legal advisors for the purposes of taking advice.



In the event that 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.

#### Transferral of personal data outside the United Kingdom

Your personal data may be transferred outside of the UK when using third party services such as Microsoft.

Where we share your personal data with third parties located in third countries that have not been deemed by the Information Commissioner's Office (ICO) as providing adequate protection, we rely on standard contractual clauses with the UK Addendum to safeguard the transfer.

#### How long we keep your personal information

We will only keep your personal information for as long as necessary to provide you with Swim Bike Run services. Unless you ask us not to, we will review and possibly delete your personal information where you have not participated in Swim Bike Run for six years.

We will keep a limited amount personal information of members for longer in order to confirm your identity, when you were a participant of Swim Bike Run and for how long. We need to do this to comply with the Companies Act 2006, which requires us to keep a register of participants or in the event of a claim against British Triathlon.

#### Protecting your personal information

You have the right to:

- ask for access to your personal information via a 'subject access request'
- ask for personal information we hold about you to be correct
- ask for your personal information to be deleted. This enables you to ask us to delete or remove your personal information where there is no good reason for us continuing to process it
- object to the processing of your personal information where we are relying on a legitimate interest, and there is something about your particular situation which makes you want to object to processing it
- ask for the processing of your personal information to be restricted. This enables you to ask us to suspend the processing of personal information about you
- ask for your personal information to be transferred to another company

You can exercise any of the following rights by writing to us at dataprotection@britishtriathlon.org

Where we rely on consent to process your personal data, you have the right to withdraw your consent at any time using the methods outlined above or by clicking the unsubscribe link in any of our marketing messages.

Any requests received by British Triathlon on behalf of Swim Bike Run will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at <u>www.ico.org.uk</u>

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