



# Data Protection Policy

## 1. Introduction

The data Protection Act 1998 (“DPA”) places a number of obligations on organisations who process personal data. In particular, it regulates how an individual’s personal information is used and protects people from misuse of their personal details.

In brief, the definition of personal data covers any information through which a living individual is identifiable.

In brief, the definition of processing covers almost anything you might do with personal data including obtaining, recording, retrieval, consultation, holding, disclosing and using.

## 2. Policy Objectives

### Notification

Each organisation processing personal data must, subject to certain exemptions, register with the Information Commissioner each year. The England Touch Association (ETA) is a not for profit organisation that processes personal data only in order to meet our operational needs or fulfil legal requirements, therefore qualifies for such exemption.

### Data Protection Principles

The ETA is fully committed to ensuring that we comply with the eight data protection principles, as listed below:-

- (i) fairly and lawfully processed;
- (ii) processed for limited purposes;
- (iii) adequate, relevant and not excessive;
- (iv) accurate;
- (v) not kept longer than necessary;
- (vi) processed in accordance with your rights;
- (vii) kept secure; and
- (viii) not transferred abroad without adequate protection.

### Data Subject Rights

Individuals have rights, principally the right of access to data held about them. The England Touch Association ensures that data subjects’ rights can be appropriately exercised. The Information Commissioner has recently given advice on what type of personal data must be disclosed if an organisation receives a data access request.

For further information on Data Protection you can visit [www.ico.gov.uk](http://www.ico.gov.uk)

## 3. Data Protection Notice

### Collection and use of your information

#### Purposes

The ETA hold the details provided on registration forms with other information it holds or obtains from or about you and will use this for the following purposes:

- for maintaining records
- to respond to any enquiries you make
- to administer any events in which you participate or may wish to participate and to deal with any incidents involving you
- to create an individual profile for you so that we can understand and respect your performance
- to create anonymised aggregated information about members and players to enable us to secure funding
- to contact you about touch events, offers and opportunities available from the ETA or any commercial partner

#### Recording images

The ETA may record official training and competition events in which you participate and general images of players will form part of the information we hold and use. In addition to the purposes for general information set out above, the ETA may use these recordings and images for the purposes of education and training, player analysis, promotion, performance, development and selection and event analysis.

#### Other uses

Where your information may be used for additional purposes, such as medical information, you will be provided with further details of how your information will be used at the relevant time

### Disclosure of your information

#### Publication on websites

Details of your achievements in events will be included on the England Touch website and these will be available to the general public. If you do not want your details to be visible in this way you can contact the ETA's Secretary by email: [secretary@englandtouch.org.uk](mailto:secretary@englandtouch.org.uk) with your request to hide your details.

#### Data use outside of the EU

If you apply for or take part in an event that takes place outside the European Union, your information will be disclosed to the relevant event organiser(s) in the host nation. These nations may not have laws as stringent as ours to protect your personal data.

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## Images

Images may be disclosed to those Regional Franchises and Affiliated Clubs for which you are a member for National Touch selection purposes. They may also be disclosed to the media for promoting touch and the reporting of events.

## Doping Control

If you enter Touch competitions, you may be subject to doping control as part of the Federation of International Touch (FIT) commitment to a drug free sport. At the time of sample collection, your personal data will be collected by event staff which undertakes the testing and administers the programme. You should see the data protection notice for details of how your information will be used.

## Accessing Data

You are entitled to a copy of your personal data from the ETA (a £10 fee will be payable in each case) and to correct any inaccuracies in it. For details of how to do this you should contact the ETA Secretary by email: [secretary@englandtouch.org.uk](mailto:secretary@englandtouch.org.uk)

## Partners

The ETA work with a number of sponsors and commercial partners (details of these can be found at [www.englandtouch.org.uk](http://www.englandtouch.org.uk)) to promote touch, raise funding for the sport and to secure opportunities for members. The ETA would like to contact you electronically to tell you more about the offers available to you. Partners help us serve you better by telling us if you express an interest in their goods and services. If you do not want your details to be shared in this way you can contact the ETA Secretary by email: [secretary@englandtouch.org.uk](mailto:secretary@englandtouch.org.uk) with your request to be deleted from our partner mailing lists.

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## APPENDIX A

### FULL EXPLANATION OF THE EIGHT DATA PROTECTION PRINCIPLES

#### First Principle

Personal Data shall be processed fairly and lawfully and in particular, shall not be processed unless -

- At least one of the conditions of Schedule 2 is met, and
- In the case of sensitive Personal Data, at least one of the conditions of schedule 3 is also met.

#### Schedule 2

- The Data Subject has given consent
- The processing is required to meet a legal obligation
- It is required for the performance of a contract
- It is necessary to protect the vital interests of the individual; carry out public functions
- It is necessary to pursue the legitimate interests of the Data Controller or third parties.

#### Schedule 3

- Explicit consent of the Data Subject
- To comply with the employers legal duty
- To protect the vital interests of the Data Subject or another person
- Carried out by certain not for profit bodies
- In legal proceedings
- To exercise legal rights
- To carry out public functions
- For medical purposes
- For equal opportunities monitoring
- As specified by order.

#### Second Principle

Personal Data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with purpose or those purposes.

#### Third Principle

Personal Data shall be adequate, relevant and not excessive in relationship to the purpose for which they are processed.

#### Fourth Principle

Personal Data shall be accurate and, where necessary, kept up to date.

#### Fifth Principle

Personal Data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

#### Sixth Principle

Personal Data shall be processed in accordance with the rights of Data Subjects under this Act.



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## Data Subject Rights:

- To subject access
- To prevent processing
- To prevent processing for direct marketing
- In relation to automated decision-making
- To rectification, blocking, reassurance and destruction
- To ask the Information Commissioner to assess whether the Act has been contravened
- To compensation

## To subject access

An individual who makes a written request and pays a fee is entitled to be:

- Told whether any Personal Data is being processed;
- Given a description of the Personal Data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- Given a copy of the information comprising the data; and
- Given details of the source of the data (where this is available).

## To prevent processing

- An individual has a right to object to processing only if it causes unwarranted and substantial damage or distress. If it does, they have the right to require an organisation to stop (or not to begin) the processing in question.
- So, in certain limited circumstances, you must comply with such a requirement. In other circumstances, you must only explain to the individual why you do not have to do so.

## To prevent processing for direct marketing

- An absolute right - individuals have the right to prevent their Personal Data being processed for direct marketing. An individual can, at any time, give you written notice to stop (or not begin) using their Personal Data for direct marketing. Any individual can exercise this right, and if you receive a notice you must comply within a reasonable period.

## Seventh Principle

Appropriate technical and organisation measures shall be taken against unauthorised or unlawful processing or Personal Data and against accidental loss or destruction or, or damage to, Personal Data.

## Eighth Principle

Personal Data shall not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection for the rights and freedoms of Data Subjects in relation to the processing of Personal Data.