**JW Sports Academy LTD**

JW Sports Academy LTD

Privacy Policy 2020

Policy Introduced: May 2018

Policy reviewed annually, most recent review: April 2021

Policy Reviewed by: Joel Wolfe - Managing Director

Key contact details: Joel Wolfe – jwsportsacademy@outlook.com / 07922694588

**Legislation and relevant guidance:**

JW Sports Academy LTD is committed to ensuring that policies and procedures remain up to date and are reflective of current legislation and guidance, currently including: General Data Protection Regulation 2018 (GDPR)

**Privacy Policy Statement:**

 JW Sports Academy LTD offers different types of services and activities.

 JW Sports Academy Sports Camps

 JW Sports Academy PPA Cover

 Revolutionary Football Academy

 Leadership Academy

 JW Sports Academy Children’s Parties

JW Sports Academy LTD are committed to protecting and respecting the privacy of our participants, their parents/guardians/carers, all of our staff, and any other people from whom we collect data from.

This policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

**For the purpose of the General Data Protection Regulation 2018, the data controller is JW Sports Academy LTD.**

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection Compliance Manager who is Joel Wolfe (Director) has overall responsibility for data protection compliance in our organisation.

Contact details are in the "Contact us" section at the end of this privacy document. Information we may collect from you could be processed and held on our date collection sheets which will not be passed on to any further parties and only used for emergency use or if we need to contact you about a service.

• Information that you provide to us by filling in application forms.

This includes information provided at the time of applying for a place on any course, or registering to use our site, applying for job roles, or requesting further services such as the purchasing of merchandise. We may also ask you for information on the telephone or if you report a problem with our site.

• We take photographs and videos of those participating in our services such as camps / parties or anything else, to which you have consented as part of the application and booking process, you have the right to opt out of these images at any point.

• Records of your interactions with us such as telephone conversations, emails and other correspondence might be held for our record but you have the choice to opt out and to delete these records at any time.

• We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them however, they DO help us in terms of progressing our business. This could also help us make events and opportunities better for yourself or your children.

 • Any credit/debit card and other payment methods you provide us will be held for our records too so we can use them to sort out of financial side of the business.

**Personal information we may collect from you.**

When you sign up for services from us, you may provide us with personal information about yourself and potentially your siblings/dependents, such as information regarding your booking. This personal information may include:

• Personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers (emergency use)

• Date of birth of for yourself or siblings for booking courses

• Gender and ages

• Records of your attendance at any events hosted by us

If you are, a member of staff or volunteer who has registered his/her interest in working with us, you may also provide us with the following personal information from you:

• Identification documents such as passport and identity cards

• Details of any club and/or county membership

• Details of next of kin, family members, coaches and emergency contacts

• Records and assessment of performance or coaching/activity leadership practice

• Any disciplinary and grievance information such as criminal offences

• Any coaching code or official number

• Coaching/teaching qualification and/or officiating history

• Information about your health, including any medical conditions, health and sickness records, medical records and health professional information.

• Criminal records information from you. For criminal records history, we process it based on legal obligations or based on your explicit consent.

• The processing is necessary for reasons of substantial public interest, on a lawful basis

• It is necessary for the establishment, exercise or defense of legal claims

• It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law

• Based on your explicit consent. In the table below (Uses of the information), we refer to these as the “special category reasons for processing of your personal data”.

**Where we collect your information**

• We typically collect personal information about you when you make a booking on our site at [www.jwsportsacademy.co.uk](http://www.jwsportsacademy.co.uk) or contact us by telephone.

• When you purchase any services or products we offer on our website.

• When you make a query and/or complaint or when you correspond with us by phone, e-mail or in phone call.

• During our events/activities in the form of photography or video (only with explicit consent from you)

• When we take images for use in promotional pieces (newspaper/internet), or for current and future publications and/or marketing such as on Facebook, Twitter, Instagram or our website.

• If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information.

Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “Your rights in relation to personal information” section below.

**Where we store your personal data.**

The data that we collect from you will be stored in the United Kingdom and processed by staffs that work for us. By submitting your personal data, you agree to this, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of 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 your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

**Paper based information is stored in the following ways:**

• At our head office in lockable cabinets (and kept for an agreed period)

• With our staff who have been DBS checked and have been trained on their responsibilities in relation to this information.

• In a file in a secure room at venues where this has been agreed.

***JW Sports Academy LTD*** staff will ensure that data is locked away at all times during periods when they are not in attendance.

Once the paper based resources have been used for the purpose that they have been designed for they will be shredded and not passed onto further parties. If we wish to keep them then we will contact you and ask you for your consent.

Any photographs and/or videos of participation in our courses/events will be used solely for the production of promotional materials in printed or electronic form, including websites, multimedia productions, social media posts, course leaflets, prospectuses, advertisements and by our sponsors and partners for the same promotional and marketing purposes. These might be also used for social media but once again, you will have the right to allow this or not.

**The data below describes the main purposes for which we process your personal information, the categories of your information involved and our Lawful basis for being able to do this.**

To administer any membership account(s)/bookings you have with us and managing our relationship with you. This could be payments you have made to us and other merchandise you have purchased. All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences. This is necessary to enable us to properly manage and administer your membership/purchase contract with us and help us sort out our financial side of the business. We may also use this information to notify you of changes to our activities, courses or programmes, which may affect you. To send you information, which is included within your membership/booking benefits, including details about discount offers, competitions and future events, partner offers and discounts and any updates on us and our activities. Record of attendance is important to us, as we want to try to encourage you to use us again.

**YOU MUTS GIVE US YOUR CONSENT BEFORE WE KEEP ANY OF THESE FILES**

All the personal information we collect from you we have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership/booking and in some cases, we may have legal or regulatory obligations to retain records. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

The security of our IT systems

Your usage of our IT systems and online site.

We have a legitimate interest to ensure that our IT systems and site are secure.

To conduct data analytics studies to better understand event attendance and trends within ***JW Sports Academy LTD***

Records of your attendance at any events or competitions hosted by us.

We have a legitimate interest in doing so to ensure that our membership/promotional material is targeted and relevant.

For the purposes of promoting us, our events/courses/activities and membership packages.

Images in video and/or photographic form.

To provide statistical and background information to our contract providers such as Regional or Governmental bodies

Participants and Staff

To make decisions about progression and development through our activities programme and to assist with the delivery of activities to suit all levels

All performance and attendance data and information about your health.

Details of any affiliated club and/or county membership.

To administer and monitor your attendance at events and competitions.

Details of any affiliated club and/or county membership.

To arrange for any trip or transportation to and from an event.

Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.

To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our facilities and to monitor and manage sickness absence.

Health and medical information.

To gather evidence for possible grievance or disciplinary hearings.

All the personal information we collect including any disciplinary and grievance information.

We have a legitimate interest in doing so to provide a safe and fair environment for all customers and to ensure the effective management of any disciplinary hearings, appeals and adjudications.

For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For the purposes of equal opportunities monitoring

Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and Performance data (academies or elite level).

We have a legitimate interest to promote an environment that is inclusive, fair and accessible.

Staff and Volunteers.

To administer your attendance at any courses or programmes you sign up to.

All contact details, transaction and payment data. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.

To conduct performance reviews, managing performance and determining performance requirements

All performance and attendance data and information about your health.

Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.

Qualification start & expiry dates.

To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements.

Information about your criminal convictions and offences.

For some of your personal information you will have a legal obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to allow your child to take part in any of our services. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you for example if you don’t give us your email address we wont be able to send you discounts or newsletters. Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us via email or telephone. However the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

We will only send marketing messages to you if you would like to receive it. You can then let us know at any time that you do not wish to receive marketing messages by emailing us at jwsportsacademy@outlook.com

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**Disclosure of your personal information**

We share personal information with the following parties for the following reasons:

• Any party approved by you.

• To any governing bodies or regional bodies for the activities covered by *JW Sports Academy LTD*: to allow them to properly administer the activities on a local, regional and national level.

• Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers.

• The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.

• Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

 • In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

• If *JW Sports Academy LTD* or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;

• In order to enforce or apply our terms and conditions, or to protect the rights, property, or safety of *JW Sports Academy LTD*, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

**Transferring your personal information internationally**

The personal information we collect is not transferred to any countries outside of the UK and the European Union.

**How long do we keep personal information for?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 3 years after your last contact with us.

*Pictures and videos may be used for social media or marketing therefore they could be kept for longer that this.*

**Your rights in relation to personal information you have:**

• The right to be informed about how your personal information is being used.

• The right to access the personal information we hold about you or your family.

• The right to request the correction of inaccurate personal information we hold about you

• The right to request the erasure of your personal information in certain limited circumstances.

• The right to object to the processing of your personal information, for example pictures.

You have the right to ask us not to process your personal data or the personal data of your children for marketing purposes. We will usually inform you (before collecting such data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You have the right to prevent such processing by checking certain boxes on the forms we use to collect your data for example ticking the “I give permission for my child to have photos taken of him/her”.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner’s website at [https://ico.org.uk/for-the- public/](https://ico.org.uk/for-the-%20public/)

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner’s Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

**Changes to our privacy policy**

We may update this privacy notice every year to make sure we are up to date with the legal requirements. Where required by law we will seek your consent to changes in the way we use your personal information. When we change anything to do with our policy or company details we will let you know ASAP.

To access your information please contact us directly at jwsportsacademy@outlook.com /joelwolfe@hotmail.co.uk or by calling the given number for our secretary and we will advise on the best way for us to process your request. Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Joel Wolfe / 35 Netherfield Road Anstey Leicester LE7 7ES / jwsportsacademy@outlook.com IP addresses and cookies- we may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

For the same reason, we may obtain information about your general Internet usage by using a cookie file, which is stored on the hard drive of your computer. Cookies contain information that is transferred to your computer's hard drive. They help us to improve our site and to deliver a better and more personalised service.

You may refuse to accept cookies by activating the setting on your browser, which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

Please note that our sponsors / partners may also use cookies, over which we have no control.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, sponsors and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

**Our Legal basis for capturing and processing data**

In addition to managing information correctly, JW Sports Academy LTD must be compliant with EU GDPR, we also have a legal basis for capturing and processing data.

The six legal bases are shown below.

Contractual necessity: the processing is necessary for a contract with the other party or individual, or because they have asked you to take specific steps before entering into a contract e.g. the contract taken out between ourselves and a delivery partner.

Legal obligation: the processing is necessary to comply with the law (not including contractual obligations) e.g. being compliant with EU GDPR.

Vital interests: the processing is necessary to protect the life of an individual e.g. a young person’s medical data.

Public interest: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law e.g. matters pertaining to national security.

Legitimate interests: the processing is justified as part of the core business, or necessary to be able to carry out the stated aims of the organization.

Consent: the individual has given clear consent for us to process their personal data for a specific purpose e.g. a customer allowing ourselves to market to them or collect feedback data.

NOTE: under the U.K. implementation of the EU GDPR, the age of consent, i.e. the age at which an individual can agree to share PII or sign up to programme, is 13 years of age.

**Cancelation Policy**

In the event of if we have to cancel an event or camp, we will give a FULL REFUND to everyone.

If you had to cancel something for example a party, event, place at a camp then we will give a FULL REFUND if you let us know in 10 days’ notice. For example if your child is now unable to attend a Sports Camp then you must give us at least 10 days’ notice. If you do not let us know in them 10 days prior the event then we cannot give you a full refund but may be able to give you some discount at a further event. So for example is you pay £150 for your child’s party but then 2 weeks before the party your child breaks his arm and can no longer take part in the party then we will give you a FULL REFUND. However if this happened 2 days before the party, we are unable to give you a full refund as we would have paid the venue by now and also sorted out employment therefore we will be able to give you 25% of what you paid and offer you some discount at a next Sports Camp or party.

Thank you for taking your time to view our Privacy Policy and read the new GDPR regulations.

Joel Wolfe – Director of JW Sports Academy LTD