



BRITISHROWING

# Privacy Notice

## Performance Programmes

Version dated 22 March 2021

TEAMWORK | OPEN TO ALL | COMMITMENT



## **PRIVACY NOTICE FOR PERFORMANCE PROGRAMMES**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your participation in performance programme activities with us. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to you if you are either:

1. a participant in the World Class Performance Programme; or
2. a participant in a Performance Pathway programme (e.g. World Class Start, High Performance Programmes in Clubs, Student Development Programme); or
3. an individual who has registered his/her interest in participating in talent identification testing (e.g. for the World Class Start programme or Para-Rowing development programme) and/or whose details we have collected from one of our affiliated clubs, schools, universities or other third-party referral; or
4. an individual who has registered his/her interest in trialling for selection to represent Great Britain or England and/or whose details we have collected from one of our affiliated clubs, schools, universities or other third-party referral; or
5. a coach of an above-mentioned individual or a person providing team support services within an above-mentioned programme.

References to **we**, **our** or **us** in this privacy notice are to British Rowing Ltd (company number 1706271) and British Rowing Events Ltd (company number 79C283), registered address 6 Lower Mall, London W6 9DJ.

We have appointed a Data Protection Officer to oversee our compliance with data protection laws as we are required to do so, our Chief Operating Officer has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

## **PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

When you participate in the activities listed above, you may provide us with or we may obtain **personal information** about you, such as the following:

- **identity information** including name, title, date of birth, gender, nationality, home nation and passport information;
- **contact information** that allows us to contact you directly such as home address, email addresses and telephone numbers, and the contact details of coaches, parents/guardians and next of kin;
- **education and career information** including information about your school, college or university; qualifications; membership of the armed forces;
- **sport information** including details of rowing club membership, British Rowing and Scottish Rowing membership, previous sporting history, results of previous sporting assessments or tests;
- **performance information** including records and assessment of training and performance, any rankings, gradings, ratings and results generated through trials, assessments, competitions and/or inclusion in any World Class Performance or Performance Pathway programme, biomechanical data;
- information about **dietary requirements**;

- **financial information** including any details required for the purposes of awarding funding or grants, any credit/debit card and other payment details you provide and details of financial transactions with you;
- **images** in video and/or photographic form and voice recordings;
- **disciplinary/grievance information;**
- **correspondence/conversation records** from your interactions with us, including emails, telephone conversations, letters and other communication channels such as WhatsApp messages;
- **IT system information** including records of use and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- **CCTV information and other information obtained through electronic means** such as swipecard.

We may not collect all of the above types of personal information about you.

### **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, allergies, physical impairment, health and sickness records, medical records and health professional information;
- physiological and anthropometric information, such as your height, weight, armspan and data from lactate and skinfold tests;

- psychological information;
- criminal records information.

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence 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; or
- you provide explicit consent.

In the table below, 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 either:

- create or update an account on our site at [www.britishrowing.org](http://www.britishrowing.org); or
- register your interest in participating in talent identification testing, through our site at [www.britishrowing.org](http://www.britishrowing.org), or through direct contact with our talent identification coaches, and during the testing process; or
- are entered in the trials system for selection for the GB Rowing Team or the England Team, and during the trials process; or

- join a World Class Performance or Performance Pathway programme, and during the course of your involvement with that programme; or
- make a query and/or complaint or when you correspond with us by phone, email or in some other way.

We may also collect personal information about you from any club, school or other organisation you are associated with or from other referrals such as from coaches or officials.

If you are providing us with details of coaches, parents/guardians and/or next of kin/emergency contacts, they have a right to know and to be aware of 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 them. They also have the same rights as set out in the **"Your rights in relation to personal information"** section below.

## **USES MADE OF THE INFORMATION**

The table 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.

We may use the contact information you provide to communicate with you during the course of any of the activities listed below. Correspondence/conversation records and IT system information may be created and retained in the process of fulfilling each of the purposes set out below.

Purpose	Types of personal information used	Lawful basis
<p><b>To make decisions about inviting you to participate in talent identification testing</b></p>	<p>Identity information, anthropometric information</p>	<p>This is necessary to enable us to assess your application for talent identification testing against the testing criteria.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To arrange and conduct talent identification testing, and make decisions about inviting you to participate in Performance Pathway activities</b></p>	<p>Identity information, contact information, education and career information, sport information, performance information, anthropometric information, health information</p>	<p>This is necessary to enable us to arrange for talent identification testing to take place and to assess your candidacy for participation in Performance Pathway activities.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To arrange and conduct trials and make decisions about selection for the GB Rowing Team or England Team</b></p>	<p>Identity information, contact information, education and career information, sport information, performance information, anthropometric information, health information, images</p>	<p>This is necessary to enable us to properly manage and administer the trials process and to make decisions about selection in accordance with the British Rowing Selection Policy, the GB Rowing Team Performance Strategy and/or the England Team Selection Policy.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>

<p><b>To review, analyse and manage performance and technique, determine performance requirements and administer the development and training requirements of all individuals within the programme</b></p>	<p>Identity information, contact information, education and career information, performance information, sport information, anthropometric information, health information, physiological and anthropometric information, psychological information, images</p>	<p>This is necessary to enable us to properly manage and administer your development through a programme, and to manage and administer the programme as a whole.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To make decisions about your progression and development through any pathway or programme and to assist with the delivery of rankings and ratings</b></p>	<p>Identity information, performance information, sport information, health information, physiological and anthropometric information, images</p>	<p>This is necessary to enable us to properly manage and administer your development through a programme.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To administer your attendance at events such as competitions, camps and training days</b></p>	<p>Identity information, contact information, sport information, performance information, financial information, health information, images</p>	<p>This is necessary to enable us to administer your attendance at events organised by us and to make event entries for teams selected for competitions.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To arrange for travel, accommodation, meals and insurance associated with events</b></p>	<p>Identity information, contact information, financial information, dietary requirements, health information, images</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data”</p>



		referred to above and/or where you have given us your explicit consent to do so.
<b>To apply for international para rowing classification</b>	Identity information, health information	This is necessary for meeting the requirements to participate in international para rowing competition.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.
<b>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 sports facilities and to monitor and manage sickness absence</b>	Health information, physiological information, psychological information	This is necessary in order to support your involvement and ensure your safety to participate.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To comply with health and safety requirements</b>	Records of attendance Records of any safety incidents	We have a legal obligation and a legitimate interest to provide you and others with a safe environment in which to participate in sport.

<p><b>To assess your eligibility for and to make nominations for any funding and/or grants, and to carry out administration related to the provision of funding and/or grants</b></p>	<p>Identity information, contact information, education and career information, sport information, performance information, financial information, health information</p>	<p>This is necessary to enable us to carry out required tasks related to the provision of funding and/or grants.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To support Clean Sport</b></p>	<p>Identity information, contact information</p>	<p>This is necessary to enable us to support the implementation of anti-doping rules and to provide support and information to you.</p>
<p><b>To manage the implementation of the Diploma in Sporting Excellence (DiSE) programme</b></p>	<p>Identity information, contact information, education and career information, sport information, performance information, anthropometric information</p>	<p>This is necessary to enable us to manage your involvement with the programme and provide support to you during it.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All information we collect including any disciplinary and grievance information</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all participants and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>

<p><b>To develop our programmes, including through data analytics studies to better understand trends within the sport</b></p>	<p>All information we collect</p>	<p>We have a legitimate interest in doing so to develop our programmes.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To arrange and manage any contracts for the provision of merchandise, products and/or services</b></p>	<p>Identity information, contact information, financial information</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of merchandise, products and/or services.</p>
<p><b>For the purposes of promoting the sport and British Rowing</b></p>	<p>Identity information, education and career information, sport information, performance information, images</p>	<p>We have a legitimate interest in doing this in order to deliver our strategic mission to lead, enable and inspire excellence in rowing at all levels.</p>
<p><b>For the purposes of equal opportunities monitoring</b></p>	<p>Identity information, education and career information, information about your race or ethnicity, health information, sport information, performance information</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to above and/or where you have given us your explicit consent to do so.</p>
<p><b>To answer your queries or complaints</b></p>	<p>Contact information, any other relevant information</p>	<p>We have a legitimate interest to provide complaint handling services to you in case there are any issues with your involvement with us.</p>
<p><b>To ensure the security of our IT systems</b></p>	<p>IT system information</p>	<p>We have a legitimate interest to ensure that our IT systems are secure.</p>

<b>To ensure the security of the National Training Centre</b>	CCTV information and other information obtained through electronic means	We have a legitimate interest to ensure that our training site is secure.
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For some of your personal information you will have a legal, contractual or other requirement or 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 admit you as a participant in our activities or we may not be able to comply with legal obligations and we may have to terminate your involvement in our activities. 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 support you in your activities with us.

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 as described in the "Contacting us" section below.

Please note however that 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. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain support to you.

**DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you;**

- **Medical and sport science service providers, including the English Institute of Sport**, for the purposes of supporting you during your involvement in our activities;
- **UK Sport and Sport England**, for the purposes of administering the World Class Performance and Performance Pathway programmes;
- **Scottish Rowing, Welsh Rowing and other Home Country organisations**, for the purpose of enabling eligible individuals to access equivalent programmes and support within the areas covered by those organisations;
- **Hartpury College**, for the purposes of supporting the DiSE programme and the World Class Start programme;
- **Other funding providers, including TASS, SportsAid and Sport NI**, for the purposes of making nominations for funding and/or grants,
- **The UK Anti-Doping Agency and World Rowing**, for the purposes of supporting the implementation of the National Anti-Doping Policy and compliance with the World Anti-Doping Code;
- **The British Olympic Association and British Paralympic Association**, for the purposes of Olympic and Paralympic team selection and administration;
- **World Rowing and other competition organisers**, for the purposes of administering your involvement in competitions;
- **Other service providers, suppliers and subcontractors**, for example, travel agents, airlines, hotels, data analysis providers (including Performance Research Institutions, Universities), kit providers, couriers, email marketing specialists, payment processors, CCTV contractors, promotional advisors, contractors or suppliers of IT services (including CRM, website, video- and teleconference services);

- **Our commercial partners**, for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners, and for the promotion of our commercial partners, where you have given your express consent for us to do so;
- **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.

We do not disclose personal information to anyone else except as set out above.

## **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

## **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 6 years after your last contact with us. Exceptions to this rule are:

- Performance information, which is held for the purposes of developing our programmes and understanding trends within the sport;
- CCTV records which are held for no more than 8 weeks unless we need to preserve the records for the purpose of prevention and detection of crime;
- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have been involved in our activities.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You may be able to update some of the personal information we hold about you through our membership portal. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

## **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- 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 restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

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/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "**Contacting us**" section below.

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 THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email the Chief Operating Officer at [dpo@britishrowing.org](mailto:dpo@britishrowing.org) or write to us at The Chief Operating Officer, British Rowing, 6 Lower Mall, London W6 9DJ.

**Version dated 22 March 2021**