

White City (Hull) Road Running Club

Privacy and Data Protection Policy



1. Background

White City (Hull) RRC ("**White City**") is a running club committed to protecting the data and privacy of its members including committee members and club officials.

2. Collection of personal data

Personal data, as defined by the Information Commissioner's office (ICO) is collected by **White City** for the purposes of club membership.

Personal data may be collected when corresponding with Club Officials, Committee Members and other club members via phone, texts, email and social media (such as Facebook pages and WhatsApp messenger groups).

Personal data is collected primarily by completing a membership form via the ConnectMyClub app when joining **White City**. The information collected includes name, date of birth, address, e-mail address, phone number, gender and name of any other England Athletics (EA) affiliated Clubs with which the new member is already registered at the time of joining.

3. Why personal data is collected

The reason White City collects personal data is to be able to administer membership and provide services of the club when a member registers with **White City**.

The lawful basis for processing personal data is that there is a contractual obligation with members to provide the membership and services being registering for.

The reasons personal data is processed includes:

- processing of membership forms and payments for **White City** membership, including for EA affiliation and membership of Hull and East Riding Sports club for facility use
- sharing data with other club members (including club officials and committee members) to provide information about club activities, social events and races
- processing and publishing of race and competition results (e.g. club handicap or Champagne League)

4. Who personal data is shared with

White City uses a membership system called "ConnectMyClub" to store membership details and provide a club app and website. Members choose their privacy options from within the app. The company who provides ConnectMyClub is called Arden Twenty. A copy of their Privacy Policy and FAQs in relation to data protection is given in Appendices 1, 2 and 3.

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When a person joins **White City** they may also become a registered members of Hull and East Riding Sports Club and England Athletics.

White City passes personal data of the member to England Athletics (e.g. name/address/email). EA then contacts the member to invite them to sign into and update the "MyAthletics portal". The member can set and amend their privacy settings using the "MyAthletics portal". Members can contact EA directly with any questions about their privacy policy and use of personal data, the current email is: dataprotection@englandathletics.org.

White City passes personal data of the member to Hull and East Riding Sports Club (H&ERSC) via their membership form. H&ERSC then registers them as a member and issues a membership card, which are issued annually. This allows use of the sports facility (toilets, showers), gives discount on food and drinks purchased at the on-site bar and allows free hire of the function room. **White City** confirms to H&ERSC annually which members have renewed their membership, as well as the club's trustee delegate to H&ERSC. Members can contact H&ERSC directly with any questions about their privacy policy and use of personal data, the current email is: hersportsclub@gmail.com.

White City may pass personal data (name) to organisers of local running club races and leagues throughout the season, if the member consents to entering such races. Examples include the Champagne League and Winter League, run by City of Hull AC and the Summer League, run by East Hull Harriers. The responsibility for processing personal data lies with the organising club and members should contact the relevant club directly with any questions about personal data.

White City does not process data for any other purpose than those detailed in this privacy policy, or if required for Safeguarding / Welfare reasons according to the Safeguarding Policy and does not provide or sell any personal data to other third parties.

5. Social Media

White City may use the following social media platforms: Facebook and WhatsApp. All members are free to join these pages/groups. It is important to note that the social media platforms have their own privacy and data protection policies for which **White City** is not responsible and cannot accept any responsibility or liability for. Members should review the relevant social media platform's policy before joining or using these platforms to submit any personal data on **White City** social media pages/groups.

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6. How long personal data is kept

White City keeps personal data on file for as long as someone is a paid member of the club. Once a member leaves White City, is deemed to have resigned per the Constitution or is removed from White City for any reason then their data will be removed from the ConnectMyClub system after the retention period in the admin section of the ConnectMyClub System which is currently set at 60 months.

7. Rights regarding personal data

Members have the right at any time to:

- request access to their personal data
- rectification of their personal data
- erasure of their personal data
- to restrict or object to certain kinds of processing of their personal data, including direct marketing
- to object to the portability of their personal data
- to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of their personal data.

Any request of the above must be made by the member themselves to whom the personal data relates to. Contact a Club Official for any enquires about personal data held by **White City**.

Prospective and existing members are not obliged to share their personal data with **White City**. However, if a prospective or existing member chooses not to share personal data with **White City**, then the club may not be able to register or administer their membership.

Changes

Version 1: New document

Version 2: Editorial changes to footer. Minor change to Section 2, addition of retention period to Section 6. Rest of document and appendices reviewed and still current - no other changes needed (Appendix 1 was updated on the ConnectMyClub app on 12/11/2023 but no actual changes made to the text).

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APPENDIX 1 – ConnectMyClub FAQ on Data Security and Usage

Frequently Asked Questions (updated: 12/11/2023)

DATA SECURITY

Does connectMyClub follow Data protection by design and default?

Yes, as a base for connectMyClub we use an actively developed framework which offers the latest security features and best development practices.

What measures does connectMyClub take to protect the data we hold?

Our server is held in a UK data centre with an active firewall. Strong passwords are required for access and connections are limited for root access by IP address.

Where is connectMyClub developed?

connectMyClub is developed by us, in Warwickshire. We do not use any third party developers.

Where is the data hosted and who hosts?

The data is hosted in a UK data centre with the data centre managed by ProStack (<https://prostack.uk/>). The server is owned by Real Point Media Ltd and managed by them.

Is the data transferred at any point outside of the UK?

The only data transferred to a third party is to support club emails and mailing lists and user transactional emails e.g. password reset emails. The third party company to which we subscribe for this service uses data centres based within the EU.

What measures does connectMyClub take to protect against cyber attacks on the data we hold?

There is a dedicated firewall with active monitoring for DDoS and penetration attempts.

Have connectMyClub experienced any data breaches in the recent past?

We have not experienced any data breaches.

For what period of time does connectMyClub retain out of date data?

The system we have developed does not generate any 'out of date' data. If a club member leaves the White City Hull RRC it is the responsibility of White City Hull RRC to remove said person from its members list. When a club member is removed from the White City Hull RRC members list the ex-club member's club related data is deleted.

How does connectMyClub backup the data and what systems are in place to protect the backups

Data is backed up hourly in a separate data centre with the same security levels as the primary server.

Data Usage

What uses does connectMyClub make of club, club members', and user data?

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connectMyClub delivers White City Hull RRC and its members' data to connectMyClub or connectMyClub app to support club organisation.

Does connectMyClub use the White City Hull RRC data for any marketing purposes?

Simple answer. No.

Is the data shared with other parties, or are other parties able to access the data for any reason?

As above, no. We are completely independent company. We feel that we are simply the custodians of any data entered into connectMyClub by White City Hull RRC or by its members. It's not for us to use, only to deliver back to club and club members in an easy to use manner, whether that be through connectMyClub or connectMyClub app.

Who is the data controller?

connectMyClub and White City Hull RRC are Joint Data Controllers. White City Hull RRC is also a Data Processor. For White City Hull RRC data you remain the data controller, connectMyClub act as data processors.

What does connectMyClub do with the data from members who are no longer active club members

When a club member leaves White City Hull RRC and the White City Hull RRC removes the ex-club member from its members list their data is deleted as it is no longer required by White City Hull RRC.

Does connectMyClub, or any third parties, ever use the data to contact White City Hull RRC members?

As White City Hull RRC is our client, and not the club members, we will never send marketing based emails to unregistered club members.



APPENDIX 2 – ConnectMyClub Privacy Policy

Privacy Policy

This privacy policy applies between you, the User of this Website and Arden:Twenty, the owner and provider of this Website. Arden:Twenty takes the privacy of your information very seriously. This privacy policy applies to our use of any and all Data collected by us or provided by you in relation to your use of the Website. Please read this privacy policy carefully.

Definitions and interpretation

In this privacy policy, the following definitions are used: Data collectively all information that you submit to Arden:Twenty via the Website. This definition incorporates, where applicable, the definitions provided in the Data Protection Act 1998; Cookies a small text file placed on your computer by this Website when you visit certain parts of the Website and/or when you use certain features of the Website. Details of the cookies used by this Website are set out in the clause below (Cookies); Arden:Twenty, we or us Arden:Twenty, a company incorporated in England and Wales with registered number 10922374 whose registered office is at Accountancy House, Priory Road, Kenilworth, England, CV8 1LL; UK and EU Cookie Law the Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended by the Privacy and Electronic Communications (EC Directive) (Amendment) Regulations 2011; User or you any third party that accesses the Website and is not either (i) employed by Arden:Twenty and acting in the course of their employment or (ii) engaged as a consultant or otherwise providing services to Arden:Twenty and accessing the Website in connection with the provision of such services; and Website the website that you are currently using, app.connectmyclub.co.uk, and any sub-domains of this site unless expressly excluded by their own terms and conditions. In this privacy policy, unless the context requires a different interpretation: the singular includes the plural and vice versa; references to sub-clauses, clauses, schedules or appendices are to sub-clauses, clauses, schedules or appendices of this privacy policy; a reference to a person includes firms, companies, government entities, trusts and partnerships; "including" is understood to mean "including without limitation"; reference to any statutory provision includes any modification or amendment of it; the headings and sub-headings do not form part of this privacy policy.

Scope of this privacy policy

This privacy policy applies only to the actions of Arden:Twenty and Users with respect to this Website. It does not extend to any websites that can be accessed from this Website including, but not limited to, any links we may provide to social media websites.

Data collected

We may collect the following Data, which includes personal Data, from you: in each case, in accordance with this privacy policy.

Your privacy is very important to us. Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate and disclose and make use of personal information. The following outlines our privacy policy.

- Before or at the time of collecting personal information, we will identify the purposes for which information is being collected.
- We will collect and use of personal information solely with the objective of fulfilling those purposes specified by us and for other compatible purposes, unless we obtain the consent of the individual concerned or as required by law.

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- We will only retain personal information as long as necessary for the fulfillment of those purposes.
- We will collect personal information by lawful and fair means and, where appropriate, with the knowledge or consent of the individual concerned.
- Personal data should be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, should be accurate, complete, and up-to-date.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorised access, disclosure, copying, use or modification.
- We will make readily available to customers information about our policies and practices relating to the management of personal information.

We are committed to conducting our business in accordance with these principles in order to ensure that the confidentiality of personal information is protected and maintained.

Our use of Data

For purposes of the Data Protection Act 1998, Arden:Twenty is the "data controller". We will retain any Data you submit for 12 months. Unless we are obliged or permitted by law to do so, and subject to any third party disclosures specifically set out in this policy, your Data will not be disclosed to third parties. This includes our affiliates and / or other companies within our group. All personal Data is stored securely in accordance with the principles of the Data Protection Act 1998. For more details on security see the clause below (Security). Any or all of the above Data may be required by us from time to time in order to provide you with the best possible service and experience when using our Website. Specifically, Data may be used by us for the following reasons: internal record keeping; improvement of our products / services; in each case, in accordance with this privacy policy.

Third party websites and services

Arden:Twenty may, from time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the Website. The providers of such services do not have access to certain personal Data provided by Users of this Website. Links to other websites

This Website may, from time to time, provide links to other websites. We have no control over such websites and are not responsible for the content of these websites. This privacy policy does not extend to your use of such websites. You are advised to read the privacy policy or statement of other websites prior to using them. Changes of business ownership and control

Any running, athletics, or triathlon club which uses connectMyClub may choose to create photo albums using Google Photos.

- The connectMyClub system can only access Google Photos with the user's express consent.
- connectMyClub can generate albums and upload image to the user's Google Photos only via the user's actions. connectMyClub will never delete photos from the user's Google Photos.
- If the club (user) chooses to show a Google Photos album, using connectMyClub, low resolution images will be downloaded to connectMyClub from Google Photos. These can be removed from connectMyClub by the user at any time.
- connectMyClub does not store the user's consent permission for longer than the user's session. Therefore connectMyClub cannot and will not access the user's Google Photos outside of the user's session.
- connectMyClub will not share and user's data with any third party aside from showing the clubs' (users') photos to the club's members, via the club app.

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Arden:Twenty may, from time to time, expand or reduce our business and this may involve the sale and/or the transfer of control of all or part of Arden:Twenty. Data provided by Users will, where it is relevant to any part of our business so transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this privacy policy, be permitted to use the Data for the purposes for which it was originally supplied to us. We may also disclose Data to a prospective purchaser of our business or any part of it. In the above instances, we will take steps with the aim of ensuring your privacy is protected.

Controlling use of your Data

Wherever you are required to submit Data, you will be given options to restrict our use of that Data. This may include the following: use of Data for direct marketing purposes; and sharing Data with third parties.

Functionality of the Website

To use all features and functions available on the Website, you may be required to submit certain Data. You may restrict your internet browser's use of Cookies. For more information see the clause below (Cookies).

Accessing your own Data

You have the right to ask for a copy of any of your personal Data held by Arden:Twenty (where such Data is held) on payment of a small fee, which will not exceed £100. Security

Data security is of great importance to Arden:Twenty and to protect your Data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure Data collected via this Website. If password access is required for certain parts of the Website, you are responsible for keeping this password confidential. We endeavour to do our best to protect your personal Data. However, transmission of information over the internet is not entirely secure and is done at your own risk. We cannot ensure the security of your Data transmitted to the Website.

Cookies

This Website may place and access certain Cookies on your computer. Arden:Twenty uses Cookies to improve your experience of using the Website. Arden:Twenty has carefully chosen these Cookies and has taken steps to ensure that your privacy is protected and respected at all times. All Cookies used by this Website are used in accordance with current UK and EU Cookie Law. Before the Website places Cookies on your computer, you will be presented with a message bar requesting your consent to set those Cookies. By giving your consent to the placing of Cookies, you are enabling Arden:Twenty to provide a better experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of the Website may not function fully or as intended.

This Website may place the following Cookies:

Strictly necessary cookies These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services. **Analytical/performance cookies** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. **Functionality cookies** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser.

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You can choose to delete Cookies at any time; however you may lose any information that enables you to access the Website more quickly and efficiently including, but not limited to, personalisation settings. It is recommended that you ensure that your internet browser is up-to-date and that you consult the help and guidance provided by the developer of your internet browser if you are unsure about adjusting your privacy settings.

General

You may not transfer any of your rights under this privacy policy to any other person. We may transfer our rights under this privacy policy where we reasonably believe your rights will not be affected. If any court or competent authority finds that any provision of this privacy policy (or part of any provision) is invalid, illegal or unenforceable, that provision or part-provision will, to the extent required, be deemed to be deleted, and the validity and enforceability of the other provisions of this privacy policy will not be affected. Unless otherwise agreed, no delay, act or omission by a party in exercising any right or remedy will be deemed a waiver of that, or any other, right or remedy. This Agreement will be governed by and interpreted according to the law of England and Wales. All disputes arising under the Agreement will be subject to the exclusive jurisdiction of the English and Welsh courts.

Changes to this privacy policy

Arden:Twenty reserves the right to change this privacy policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Website and you are deemed to have accepted the terms of the privacy policy on your first use of the Website following the alterations.

You may contact Arden:Twenty by email at hello@connectmyclub.co.uk.

01 February 2022



APPENDIX 3 – ConnectMyClub Cookie Policy

Cookie Policy

<https://app.connectmyclub.co.uk> puts small files (known as 'cookies') onto your computer to collect information about how you browse the site.

Cookies are used to:

- measure how you use the website so it can be updated and improved based on your needs
- remember the notifications you've seen so that we don't show them to you again

How cookies are used on <https://app.connectmyclub.co.uk>

Measuring website usage (Google Analytics)

We use Google Analytics software to collect information about how you use <https://app.connectmyclub.co.uk>. We do this to help make sure the site is meeting the needs of its users and to help us make improvements, for example improving site search.

Google Analytics stores information about:

- the pages you visit on <https://app.connectmyclub.co.uk>
- how long you spend on each <https://app.connectmyclub.co.uk>
- how you got to the site
- what you click on while you're visiting the site

We don't collect or store your personal information (for example your name or address) so this information can't be used to identify who you are.

Google Analytics sets the following cookies:

Google Analytics

Name	Purpose	Expires
_utma	This lets us know if you've visited before, so we can count how many of our visitors are new to https://app.connectmyclub.co.uk or to a certain page	2 years
_utmb	This works with _utmc to calculate the average length of time you spend on https://app.connectmyclub.co.uk	30 minutes
_utmc	This works with _utmb to calculate when you close your browser	when you close your browser
_utmz	This tells us how you reached https://app.connectmyclub.co.uk (for example from another website or a search engine)	6 months

Our introductory message

You may see a pop-up welcome message when you first visit <https://app.connectmyclub.co.uk>. We'll store a cookie so that your computer knows you've seen it and knows not to show it again.

Making secure connections to websites

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Your browser uses cookies to make secure connections to websites with a 'https' URL. There are different versions for different levels of security.