



EIBA Privacy Notice including Internet-Social Media

WHAT THIS PRIVACY NOTICE COVERS

We at the English Indoor Bowling Association Limited (“EIBA”), *a private company limited by guarantee without share capital, registered in England and Wales with Company Number 06714071. The Registered Office is David Cornwell House Bowling Green, Leicester Road, Melton Mowbray, Leicestershire, LE13 0FA*

(“we” or “our” or “us”) want to make sure all the personal information we have collected about you, is safe and secure whether we collect it through our website at www.eiba.co.uk (“Site”) or from other sources.

We are the National Governing Body (NGB) for Indoor Level Green Bowls in England.

This Privacy Notice sets out our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the **GDPR**) and explains how we collect, store and use your personal information.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws, as we not required to do so, but our Data Protection Manager has overall responsibility for data protection compliance in our organisation.

If you have any questions about this Privacy Notice or what we do with your personal information, their contact details are set out in the “**Contacting us**” section at the end of this privacy notice.

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after involvement 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 an individual player/participant of Indoor Level Green Bowls who has registered his/her interest in participating in the sport and/or whose details we have collected from one of our Affiliated Clubs, County Associations or directly from the player/participant.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

You may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, postal addresses, email addresses and telephone numbers;
- date of birth;
- gender;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- records of your attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you,
- your views on the Sport of Indoor Level Green Bowls.

Players/Participants

If you are a player/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following additional **personal information** from you:

- details of any club and/or county membership;
- details of next of kin, family members and emergency contacts;
- records and assessment of any player rankings, gradings or ratings, competition results, details regarding [events/matches/games] attended and performance (including that generated through player pathway programme);
- any disciplinary and grievance information;
- your views on EIBA National Competitions

2. 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, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

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
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about you when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a player/participant of Indoor Level Green Bowls, we also may collect personal information about you from any Club or County Association which is affiliated to us.

If you are providing us with details of 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.

EIBA E-Newsletter – see Section 6.

4. USES MADE OF THE INFORMATION

We rely on legitimate interest basis to use your personal information. We have a legitimate organisational interest to use your information to facilitate and govern Indoor Level Green Bowls in England.

We may use your information for a number of purposes including the following:

- i. Compliance with legal, regulatory and corporate governance obligations and good practice;
- ii. To deal with and respond to your requests and enquiries;
- iii. To provide you with information about our work or our activities that you have agreed to receive;
- iv. To ensure we know how you prefer to be contacted;
- v. To keep a record of your relationship with us;
- vi. To notify you about EIBA events that you have shown an interest in: and
- vii. The Table outlined below.

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.

Purpose	Personal information used	Lawful basis
<u>EIBA – Affiliated Clubs/County Associations and “Affiliated Bodies”</u>		
To ensure effective communications between NGB and its Membership – Affiliated Clubs, Affiliated County Associations and “Affiliated Bodies”	Contact details for key Officers	We have a legitimate interest in order to effectively manage the Sport of Indoor Level Green Bowls.
<u>National Competitions</u>		
To administer National Competitions	<p><i>Prior to Final Stages of Competitions:</i></p> <p>Name, Club/County name, telephone number email address, title, date of birth, for the “Named Entrant”</p>	<p>We have a legitimate interest in order to effectively manage the National Competitions.</p> <p>Consent is obtained for the publication of Personal data on EIBA Website and in “Competition Area Draw Books”.</p> <p>Where appropriate, “Parental Consent” will be obtained.</p>
	<p><i>At the Final Stages of Competitions:</i></p> <p>Names of All Team members and Club/County name</p> <p>Winners and Runners-Up of Finals - Personal Images</p>	<p>We have a legitimate interest in order to effectively manage the National Competitions.</p> <p>Consent is obtained for the publication of Personal data on EIBA Website, in National Finals Programmes, in the EIBA Yearbook and on the EIBA Twitter feed.</p> <p>Where appropriate, “Parental Consent” will be obtained.</p>
To administer the “Fantastic 5’s” Competition	<p>Name, telephone number email address for “Team Contact”.</p> <p>Names of All Team members and Team Name.</p> <p>Winning Team - Team picture</p>	<p>We have a legitimate interest in order to effectively manage the National Competitions.</p> <p>Consent is obtained for the publication of Personal data on EIBA Website, in National Final Programme, in the EIBA Yearbook and on the EIBA Twitter feed.</p> <p>Where appropriate, “Parental Consent” will be obtained.</p>

<u>Internationals</u>		
To consider participants for selection to International Squads	Contact details and records of past Achievements. Information provided by EIBA Selectors, Affiliated Clubs and County Associations.	We have a legitimate interest in order to effectively manage the International events. Where appropriate, "Parental Consent" will be obtained.
To administer International Events	Contact details for Players selected for the events	We have a legitimate interest in order to effectively manage the International events. Where appropriate, "Parental Consent" will be obtained.
<u>Presidents Matches</u>		
To administer the Matches	Contact details for Players selected for the events	We have a legitimate interest in order to effectively manage the International events. Where appropriate, "Parental Consent" will be obtained
<u>All Persons</u>		
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide an information service or complaint handling service to you.
Retention of records	All the personal information we collect	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 and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above. 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 portals.	We have a legitimate interest to ensure that our IT systems are secure.

To conduct data analytics studies to better understand event attendance and trends within the sport	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 is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.
<u>Players/Participants</u>		
Delivery of EIBA Ranking system for Males and Females	Performance data in the National Championship events (Singles, Pairs, Triples, Fours and Champion of Champions), BIIBC/BIWIBC Championships, International appearances over the last “five-year period” (Junior International appearances over the last two years only). Details of Affiliated Club and Name of Participant.	We have a legitimate interest in doing so in order to encourage participation at the highest level. Full details about the “Ranking system” can be found at www.eiba.co.uk/Rankings/explanation.php
To administer any drug and alcohol testing	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
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 members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To assess your eligibility for and to provide any Bursaries	All details required for the purposes of awarding Bursaries.	This is necessary to enable us to properly administer the EIBA Bursary Schemes.

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 a basis other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place.

5. **WEBSITE AND SOCIAL MEDIA**

Information we gather via the Website

EIBA gathers certain information about you when you use our website.

Website enquiry via selected email address

When you contact us via one of the emails detailed on our website, a member of the specified department will receive the enquiry. This information will be dealt with in accordance with our Privacy Notice.

We may use the information provided for a number of purposes depending on what your enquiry is about, including the following:

- i. Compliance with legal, regulatory and corporate governance obligations and good practice; and
- ii. Deal with and respond to your enquiry

Cookies

Our website uses cookies which allow a server to uniquely identify each browser on each page. We use cookies to collect information about you to store your online preferences. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.

We use the following category of cookie on our website:

- i. Performance cookie

We use Google Analytics to help us understand how people arrive at our website, how many people arrive at our website and how people browse or use our website. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily. The data stored by these cookies never shows personal identifiable information from which your details can be ascertained.

Find out more about how Google works to protect your data: <https://support.google.com/analytics/answer/6004245>

Social media cookies

These cookies allow people to connect with EIBA via our social media channels, such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies.

Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site. To find out more about cookies please visit: www.allaboutcookies.org or see www.youronlinechoices.eu

How we may use your information

We will use the information we get from your use of our website and services to:

- i. Administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- ii. Improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- iii. As part of our efforts to keep our website safe and secure;
- iv. Measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you.

Linking with Third Party Sites

Our Site may, from time to time, contain links to and from the websites of our commercial partners, advertisers and Clubs/County Associations and other Sports related bodies. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third-party site and contact its owner or operator if you have any concerns or questions.

Security

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information

Downloads

Any downloadable documents, files or media made available on this website are provided to users at their own risk.

While all precautions have been undertaken to ensure only genuine downloads are available, users are advised to verify their authenticity using third party anti-virus software or similar applications. We accept no responsibility for third-party downloads and downloads provided by external third-party websites and advise users to verify their authenticity using third party anti-virus software or similar applications.

6. EIBA E-NEWSLETTER

Visitors to our "Website Homepage" have the option to subscribe to the "EIBA E-Newsletter"

The purpose of the Newsletter is for the "Subscriber" to receive News from the EIBA including Events and Membership Benefits being offered by EIBA Commercial Partners.

The Subscribers Personal Data is:

- only used for sending the "EIBA E-Newsletter"
- it is not shared with any Third Party.

This service is provided to the EIBA in accordance with a "CRM Agency Agreement" between English Indoor Bowling Association Ltd (EIBA) and Goodform Ltd, 7 Olympus Court, Tachbrook Park, Warwick CV34 6RZ

Goodforms "Privacy Policy" can be found at <http://goodformgroup.co.uk/privacy-policy/>

Goodform and UK Changes (their Processor) do not transfer data outside of the United Kingdom.

A "Subscriber" can "Unsubscribe" at any point using the link at the bottom of each E-Newsletter.

7. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **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.

8. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

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

9. 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.

Exception to this rule is:

- 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 worked for us.

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 can contact us using by using the details set out in the "**Contacting us**" section below.

10. 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.

11. 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.

12. CONTACTING US

The Data Protection Manager is the first point of contact regarding any enquires arising from this Privacy Notice.

Where possible, please raise all enquires in writing or by email.

If you are unhappy with our work or something that we have done or failed to do, please inform us in writing or by email.

We will acknowledge receipt of all complaints and endeavour to investigate the complaint within twenty working days.

Our Data Protection Manager (Stephen Rodwell) can be contacted at:

*English Indoor Bowling Association Ltd
David Cornwell House
Bowling Green
Melton Mowbray
Leicestershire
LE13 0FA*

Email: SteveRodwell@eiba.co.uk

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<https://ico.org.uk/for-the-public/> or <https://ico.org.uk/concerns/handling/>

Version Date: 24th May 2018