

TEAM ENGLAND - ATHLETE PRIVACY NOTICE

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ABOUT US AND THIS NOTICE



This Privacy Notice is provided by Commonwealth Games England, trading as Team England ('we', 'us' or "**Team England**"). We are a 'controller' for the purposes of the UK General Data Protection Regulation incorporated by the UK's Data Protection Act 2018 (collectively referred to as the "**Data Protection Laws**"). We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information about our processing and your rights.

How to contact us

If you have any questions about this Privacy Notice, how we handle your **personal data**, or would like to exercise any of your rights, please contact:

Data Protection Officer:	Harriet Smith
Address:	5th Floor, Holborn Tower, 137 – 144 High Holborn, London WC1V 6PL
Telephone number:	+44 (0) 207 831 3444
Email:	dpo@teamengland.org

Changes to the Privacy Notice

The latest version of the Privacy Notice can be found on the Team England home page at <https://teamengland.org/privacy-policy> We may change this Privacy Notice from time to time. We will alert you by posting a notice on our website when changes are made.

USEFUL WORDS AND PHRASES



We have listed below certain words and phrases that have particular meanings in the **Data Protection Laws** and are used throughout this Privacy Notice:

Term	Definition
controller	This means any person who determines the purposes for which, and the manner in which, any personal data is processed.
Data Protection Laws	This means the laws which govern the handling of personal data. This includes the UK General Data Protection Regulation incorporated by the Data Protection Act 2018 and further laws and statutory instruments relating to such regulations from time to time.
data subject	This means the person to whom the personal data relates.
ICO	This means the UK Information Commissioner's Office, which is responsible for implementing, overseeing and enforcing the Data Protection Laws in the UK.
personal data	<p>This means any information from which a <u>living individual</u> can be identified.</p> <p>This will include information such as telephone numbers, names, addresses, e-mail addresses, photographs and voice recordings. It will also include expressions of opinion and indications of intentions about data subjects (and their own expressions of opinion/intentions).</p> <p>It will also cover information which on its own does not identify someone but which would identify them if put together with other information which we have or are likely to have in the future.</p>
processing	<p>This covers virtually anything anyone can do with personal data, including:</p> <ul style="list-style-type: none">• obtaining, recording, retrieving, consulting or holding it;• organising, adapting or altering it;• disclosing, disseminating or otherwise making it available; and• aligning, blocking, erasing or destroying it.

special categories of personal data	This means any information relating to: <ul style="list-style-type: none">• racial or ethnic origin;• political opinions;• religious beliefs or beliefs of a similar nature;• trade union membership;• physical or mental health or condition;• sexual life; or• genetic data or biometric data to uniquely identify you.
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WHAT PERSONAL DATA DO WE COLLECT AND WHY?



We will be processing personal information for multiple reasons in order to manage Team England at the 2023 Commonwealth Youth games ("**Games**") which will be held in Trinidad and Tobago. In order to effectively manage Team England, we will collect the data set out below.

Athlete Management Data

We will process all athlete data for the provision of the Games on the athlete data management system.

The following personal data will be collected:

Personal data	Special categories of data
<p>Personal details:</p> <ul style="list-style-type: none"> • Personal Details • Full name • Date of birth, place of birth and nationality • Gender • Marital Status • Handed (L/R) • Passport details including passport Scan (image upload) • Contact Details • Next of Kin Details • Accreditation Photo <p>Measurements</p> <ul style="list-style-type: none"> • Preference of unisex or female fit • Favourite sport brand and sizes • What is your favourite sports brand? • Alteration information to garments • Measurement boxes for: Shoulder, sleeve length, chest size, waist size, hip, inside 	<p>Disability</p> <ul style="list-style-type: none"> • Disability Details (if any) <p>Other information</p> <ul style="list-style-type: none"> • Allergies/Dietary Requirements

<p>leg, shoe size.</p> <ul style="list-style-type: none"> • Height (cm) • Weight (kg) <p>Other information</p> <ul style="list-style-type: none"> • Personal Background • Hospital of birth • Queens Honours • Education details • Sporting Career • Previous Commonwealth Games/ Youth Games attendance, medals • Details of coach and club • Olympic/Paralympic Games attendance and medals • Social Media information (Instagram, Facebook, Twitter, Tiktok, Youtube) 	
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Anti-Doping Data

We process the following personal data about you to communicate with UK Anti-Doping.

Personal data	Special categories of data
<ul style="list-style-type: none"> • User ID • Password • Trading activity • Eligibility to compete 	<ul style="list-style-type: none"> • None

Performance Data - Medical Information

We process the following data regarding your medical information. . We obtain this information from The England Institute of Sport who share this information with us.

Personal data	Special categories of data
<ul style="list-style-type: none">• Name• Email address• ID documentation (e.g. passport)	<ul style="list-style-type: none">• Full medical records of the athlete

Personal data about other individuals

If you give us information on behalf of someone else, you confirm that the other person is aware that you have provided their personal data to us and that they are aware of this privacy notice.

WHY DO WE PROCESS YOUR PERSONAL DATA?



We use your personal data for the following purposes listed in this section. We are allowed to do so on certain legal bases (please see section '**How is processing your data lawful**' for further detail)

Type of data	Why do we need it?	Lawful basis for processing
Athlete management data (not special categories of data)	To enable us to assist and manage your participation in the Games.	<p>Processing is necessary:</p> <ul style="list-style-type: none"> ➤ For the performance of a contract between Team England and you; ➤ For a legitimate interest: we will need to process your social media information for purpose of promoting the Games; and ➤ In order to protect your vital interests in emergency situations before and during the Games.
Athlete management data (special categories of data)	To enable us to assist and manage your participation in the Games.	<p>Processing is necessary:</p> <ul style="list-style-type: none"> ➤ In order to protect your vital interests in emergency situations; and ➤ For a substantial public interest to ensure equality of opportunity or treatment.
Performance data (not special)	To enable us to assist and manage your participation in	<p>Processing is necessary:</p> <ul style="list-style-type: none"> ➤ For the performance of a

Type of data	Why do we need it?	Lawful basis for processing
categories of data)	the Games and assist with your sport specific enquiries/ obligations.	<p>contract between Team England and you; and</p> <ul style="list-style-type: none"> ➤ for a legitimate interest: we will need to process your personal data to manage Team England for the Games, ensure athletes are medically fit and well to participate and be able to administer medical treatment if required during the Games.
UK anti-doping data	To make sure that we following legal requirements governing use of drugs in sport.	<p>Processing is necessary:</p> <ul style="list-style-type: none"> ➤ For the performance of a contract between Team England and you; and ➤ for a substantial public interest to preserve anti-doping in sport
Performance data (special categories of data)	To enable us to assist and manage your participation in the Games and assist with your sport specific enquiries/obligations.	<p>Processing is necessary:</p> <ul style="list-style-type: none"> ➤ In order to protect your vital interests in emergency situations; and ➤ For a substantial public interest to protect the integrity of a sport or sporting event.

HOW IS PROCESSING YOUR PERSONAL DATA LAWFUL?



Personal Data

We are allowed to process your personal data based on the following legal bases for the purposes explained in the previous section "**Why Do We Process Your Personal Data**":

- Legitimate Interests - We are permitted to process your personal data if it is based on our 'legitimate interests' i.e. we have good, sensible, practical reasons for processing your personal data which is in our interests. To do so, we have considered the impact on your interests and rights, and have placed appropriate safeguards to ensure that the intrusion on your privacy is reduced as much as possible. The table in the previous section "**Why do we process your personal data**" explains the personal data processed on this basis.

You can object to processing that we carry out on the grounds of legitimate interests. See the section headed "Your Rights" to find out how.

- Contract - It is necessary for our performance of the contract you have agreed to enter with us. If you do not provide your personal data to us, we will not be able to carry out our obligations under the terms of your contract.]
- Legal obligation - We are subject to legal obligations to process your personal data for the purposes of complying with applicable regulatory rules i.e working with the UK Anti-Doping Agency and to make mandatory disclosures to government bodies and law enforcement agencies.
- Vital Interest – We are permitted to process your personal data if processing is necessary to protect your vital interest (e.g. to process your medical records to protect your life during the Games)

Special Categories of Personal Data

We are allowed to process your special categories of personal data for the following reasons and on the following lawful bases:

- Vital Interests – We are permitted to process your personal data if processing is necessary for us to protect your vital interest E.g. it is necessary for us to process your

medical / health information, for the purposes of following our health and safety procedures, which in turn could assist us if we are required to protect your life.

- Substantial Public Interest – We are permitted to process your personal data if processing is necessary for a substantial public interest e.g. to protect the integrity of the Games by processing your data with UK Anti-Doping, protecting your interests during the Games by ensuring you are fully equipped with the materials and resources to participate in the Games and represent Team England to the best of your ability.

WHO WILL HAVE ACCESS TO YOUR PERSONAL DATA?



We use processors (such as the England Institute of Sport and Association of Multisport Organisations) to support our IT systems. Some of these service providers will process your data as part of the services they offer to us. We take steps to ensure that our service providers treat your data in accordance with the law, only use it in accordance with our contract with them and keep it secure. If you would like to know the names of our other service providers, please contact us (see section "**How to Contact Us**").

Athlete Management Data shared with National Governing Bodies ("**NGBs**")

As athletes will be competing within the Games, we will manage Team England and we will share your personal data with the relevant NGBs to ensure your participation within the Games is most effective and ensuring you may compete to the best of your ability.

We will act as joint controllers with the relevant NGB and process your personal data in compliance with the relevant Data Protection Laws. The relevant NGB provide further details on how we share your data together, within their privacy notice, which can be found on their website.

Transfers of your information out of the United Kingdom and the European Economic Area ("**EEA**")

We use suppliers in the United States of America to provide the athlete management database, both of which are located outside the United Kingdom and the EEA, for the purpose of processing your personal data for your participation in the Games.

Any transfer of your data will be carried out in accordance with the law to safeguard your privacy rights and give you remedies in the unlikely event of a security breach or to any other similar approved mechanisms. If you want to know more about how data is transferred, please contact us using the details in the section above.

How we keep your data secure

We strive to implement appropriate technical and organisational measures in order to protect your personal data against accidental or unlawful destruction, accidental loss or alteration, unauthorised disclosure or access and any other unlawful forms of processing. We aim to ensure that the level of security and the measures adopted to protect your personal data are appropriate for the risks presented by the nature and use of your personal data. We follow recognised industry practices for protecting our IT environment and physical facilities.



WHEN WILL WE DELETE YOUR DATA?

The following categories of personal data and special categories of personal data will be kept for the following periods.

Data we process	How long this will be held for
Athlete management data (not special categories of data))	For up to 18 months following the TTO2023 Games
Athlete management data (special categories of data)	For up to 18 months following the TTO2023 Games
Performance data (not special categories of data)	For up to 18 months following the TTO2023 Games
Performance data (special categories of data)	For up to 18 months following the TTO2023 Games

YOUR RIGHTS



As a data subject, you have the following legal rights under the Data Protection Laws in relation to your personal data. You can exercise these rights free of charge, by contacting us (please see "**How to contact us**"). We will respond to any rights that you exercise within a month of receiving the request unless the request is particularly complex, in which case we will respond within three months.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response

Please be aware that there are exceptions and exemptions that apply to some of these rights, which we will apply in accordance with the Data Protection Laws.

YOUR DATA PROTECTION RIGHTS	WHAT DOES THIS MEAN?
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and what your rights are. This is why we are providing you this Privacy Notice.
2. Right of access	<p>You have the right to obtain access to your personal data we process and certain other information (similar to that provided in this Privacy Notice).</p> <p>This is so you are aware and can check that we are using your information in accordance with Data Protection Laws.</p> <p>You may ask for:</p> <ul style="list-style-type: none">• A copy of your information;• Details of the purpose for which it is being processed;• Details of the recipients or classes of recipients to whom it is or could be disclosed, including if they are overseas and what protections they have in place;

YOUR DATA PROTECTION RIGHTS	WHAT DOES THIS MEAN?
	<ul style="list-style-type: none"> • The period for which it is held (or the criteria which determines this); • Any information available about the source of the data; and • Whether we carry out any automated decision-making or profiling, and where we do information about the logic involved and the outcome or consequences of that decision or profiling. <p>To help us find the information, please give us as much information as possible about the type of personal data you would like to see.</p>
3. Right to rectification	You are entitled to have your information corrected if it is inaccurate or incomplete. If you would like us to do this, please contact us (see section " How to Contact Us ").
4. Rights in relation to automated decision making	These rights are not applicable as we do not carry out any automated decision making.
5. Right to erasure	<p>This is also known as the 'right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where:</p> <ul style="list-style-type: none"> • You do not believe that we need your data in order to process it for the purposes set out in this Privacy Notice; • If you had given us consent to process your data, you withdraw that consent and we cannot otherwise legally process your data; • You object to our processing and we do not have any legitimate interests that mean we can continue to process your data; or • Your data has been processed unlawfully or have not been erased when it should have been.

YOUR DATA PROTECTION RIGHTS	WHAT DOES THIS MEAN?
6. Right to restrict processing	<p>You have rights to 'block' or suppress further use of your information. When processing is restricted we can still store your information, but may not use it further. You may request that we stop processing your personal data temporarily if:</p> <ul style="list-style-type: none"> • You do not think your data is accurate. We will start processing again once we have checked whether or not the data is accurate; • The processing is unlawful but you do not want to erase your data; • We no longer need the personal data for our processing, but you need the data to establish, exercise or defend legal claims; or • You have objected to the processing because you believe that your interests should override [the companies] legitimate interests.
7. Right to data portability	<p>You have rights in certain circumstances to obtain and reuse your personal data for your own purposes across different services.</p>
8. Right to object to processing	<p>You have the right to object to certain types of processing, including processing based on our legitimate interests and processing for direct marketing.</p>
9. Right to withdraw consent	<p>If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, that does not mean anything we have done with your personal data with your consent up to that point is unlawful.)</p> <p>We make this withdrawal easy for you by [e.g. providing you with a personalised table below, which contains a list of the consent you have given us, as well as the option to "untick" the consent].</p> <p>We will also contact you via electronic means [SMS or email] to allow you to assess the consent which you have given us.</p>

What if your rights are breached?

You may be entitled to compensation for damage caused by contravention of the **Data Protection Laws**.

Complaints to the regulator

It is important that you ensure you have read this Privacy Notice. If you do not think that we have processed your data in accordance with this Privacy Notice, you should let us know as soon as possible. You also have the right to complain to the Information Commissioner's Office (**ICO**). Information about how to do this is available on its website at www.ico.org.uk.