

**Data Privacy Notice: protecting your personal data** (which includes photographic images and video footage)

The League is arranged jointly by four cycling clubs in South London: Penge Cycle Club, Limited Edition Cycling Club, Herne Hill Youth Cycling Club and Bigfoot Go-Ride (the Organisers). The League is formed of cycle races for children (the Riders). The League is committed to protecting and respecting your privacy and that of your children. For any personal data you provide for the purposes of your child's participation in the League, the Organisers are the Data Controller and are responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way. This document provides you with information about how we handle your personal information.

If you are aged 16 or under, you must get your parent or guardian's permission before you provide any personal information to us.

**1 - What personal data we hold and how it is handled**

To participate in the League you will give us information about you and your children by filling in the entry forms at the races, or by corresponding with us by phone, e-mail or otherwise. The information you give us on the entry forms will include the Rider's name, gender, year of birth, cycle club (if any), ethnicity (optional), religion (optional) and any medical / disability / behavioural issues that may be relevant to participation in the races. We will also ask for the name, address, phone number and relationship to the Rider of an adult we may contact in the event of an emergency.

We also record information relating to your child's racing results – in the form of race season, name, age category, gender, positions, points scored, awards and cycling club (if any).

We may record information about emails and other communications we have sent to you and your interaction with them, and, if you contact us, we may keep a record of that correspondence.

Electronic information will be held and processed on the computers (and/or in recognised 'cloud' storage) of a limited number of volunteers with the League. Paper based information will be held and processed at the addresses of a limited number of volunteers with the League. The data will be carefully handled and passed between these volunteers (eg by hand or email). These volunteers will all be aware of this Data Privacy Notice

**2 - Why we need your personal data**

The reason we need your personal data, and that of your child, is to be able to administer and safely arrange your child's participation in the League; as well as having the ability to make contact in case of an emergency. Our lawful basis for processing your personal data is that we have a contractual obligation to you to provide the racing services you are registering for. Please also refer to section 4 with regards to photographs and video footage.

**3 - Special category data**

Any "special category data" that we hold about your child (i.e. information relating to health, medical conditions and disability) is only processed for the specific purpose of enabling us to run safe and effective events. Our condition for processing this data is based on your explicit parental consent, which we will ask for at the point of your completion of the entry form. You should only supply us with information about relevant medical issues or disabilities or behavioural issues that we need to be aware of in order to deliver safe and effective cycle races.

#### **4 - Website and social media, photographs and video footage**

Your information may be shared with the wider world on the Organisers and the League's websites and social media pages – this data will be limited to the Race season, Rider's name, age category, gender, positions, points scored, awards and cycling club (if any); as well as photographs and video footage

The photographs and video footage may contain not only your child but also the persons accompanying them.

The reasons for sharing photographs and video footage is to promote the League; and to celebrate the achievements of those participating in the League by sharing action images and footage of the races and other aspects of the event. Also at times the photographs and video footage may help us determine race results. The aspect of promoting the League is particularly important to us, as we are keen to encourage children to take part in the healthy sport of cycling.

This use of photographs and video footage is carried out by the League as a legitimate interest. We are however mindful of balancing our legitimate interest with that of your privacy and with that in mind:

- a) no captions will link the persons in these photographs and video footages to the names or contact details of those persons, nor will any caption mention anything related to the persons health, medical conditions or disability
- b) although in photographs and video footage riders will be shown with race numbers, the League's publicised race results will not show race numbers by the names of the riders – thus preventing a link between published names and persons in photographs and video footage
- c) we will not take and use photographs or video on podiums or of riders with certificates, this is to avoid the possibility of persons in photographs or in video footage being identified with reference to the race results
- d) likewise we will not caption photographs with event locations, to reduce the risk of cross referencing
- e) we will be proportionate – so we will not retain and use large quantities of photographs and video, just a representative few, no more than around 100 per event
- f) we will be considerate and sensitive – we will not retain or use photographs and video that may cause distress, for example associated with an accident or someone who is upset
- g) we will only use photographs and video taken by persons the League have asked to take such images and footage, all of whom will be made aware of this Privacy Policy and who if questioned by people at the event will refer to this Policy
- h) we will only retain and use photographs / video from the start of the 2018/19 racing season, ie from when this Privacy Policy was in place

As these races are public events it is impractical to restrict the subjects of photographs and video away from certain individuals, many images will also contain many riders in the same image.

The providers of the social media platforms have their own privacy policies and the League does not accept any responsibility or liability for these policies.

#### **5 - Who we share your personal data with**

The League and the Organisers will not share your information or any photographs / video footage that may contain your child and/or persons accompanying them with any third parties; including that they will not be shared with British Cycling (apart from the exceptions as mentioned below).

The only exceptions would be in the event of an incident or accident where it is found to be necessary to involve third parties such as the Organiser's governing bodies (eg British Cycling), insurers, police, ambulance services etc

The Leagues and Organisers data processing may require personal data, images and video footage to be transferred outside of the European Economic Area for the purposes of cloud hosting. The League and Organisers will not knowingly permit that this takes place in a manner without the appropriate safeguards in place.

## **6 - How long we hold your personal data**

We will hold your personal data, and your child's personal data, on file for no more than 5 years after the completion of the relevant racing season – after which it will be securely destroyed.

The only exception being:

- Data relating to racing results which will be kept indefinitely as an archive. This data would not include more than Race season, Rider's name, age category, gender, positions, points scored, awards and cycling club (if any).
- The above mentioned photographs and video footage will also be kept indefinitely as an archive.
- Data linked to matters such as insurance claims, subject access requests, disputes, safeguarding matters, accidents, disciplinary or legal matters – where the League is aware of the matter and considers it necessary / has knowledge of the need to retain the data, then that data will be retained for a reasonable extended period

## **7 - Your rights regarding your personal data**

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data, or your child's personal data; to restrict or object to certain kinds of processing of your personal data, or your child's personal data; to the portability of your personal data, or your child's personal data, and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data, or your child's personal data.

## **8 - Contacting us about your personal data**

All communications regarding your personal data should be emailed to: [adam@bigfootcc.co.uk](mailto:adam@bigfootcc.co.uk)

## **9 – IMPORTANT NOTE**

The League events take place in public or semi-public venues – as such it is not possible to have control over the Riders, parents, carers or other persons who may take photographs or video footage or record other data

Anyone contacting any cycling clubs (including the above mentioned four clubs that organise the League) needs to be aware that such contact you have or data you provide to those clubs that may make reference to the League, and those interactions, will be governed by the general data protection regulations as set out in those club's Data Privacy Notices of which you will need to be familiar