

Manuden Running Club Privacy Notice

Welcome to the privacy policy of the Manuden Running Club (**MRC**). MRC respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you provide it to us and tell you about your privacy rights and how the law protects you. Please also use the Glossary at the end to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how the MRC collects and processes your personal data through your provision of personal data to us.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide so that you are fully aware of how and why we are using your data.

Controller

MRC is the controller and responsible for your personal data (collectively referred to as "MRC", "we", "us" or "our" in this privacy policy). We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

Email address: funrun@manuden.org.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on **25 June 2022**.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website, which is within the Manuden.org.uk website, may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, membership number(s) and gender (as well as emergency contact details for a family member, friend or equivalent of yours for a running event).
- **Marketing Data** includes your preference in receiving marketing from us and our third parties and your communication preferences.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers (as well as emergency contact details for a family member, friend or equivalent of yours for a running event).
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of events (in particular running race entries) you have purchased from us.
- **Sporting Data** includes times and event positions.
- **Photographic Data** includes photos, videos or equivalent.

If a parent/guardian has entered a child/minor into one of our running event we will hold certain of the above personal data about the child/minor as well as the parent/guardian.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data), unless it is necessary for a running event or otherwise concerning our club (e.g. health data in an emergency). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We may use different methods to collect data from and about you but it will be through interactions with you (or on your behalf). You may give us (or give our processors on our behalf) your personal data by filling in forms or by corresponding with us by post, the internet, phone, email, taking part in a running event or otherwise.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to in relation to running events that you have entered or are otherwise connected with.
- Where you have provided consent to us in respect of the use in question of your personal data. For this basis, you have the right to withdraw consent at any time.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you in connection with a running event that we are organising	(a) Identity (b) Contact	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey (c) Recording information about you concerning a running event or otherwise concerning our club (d) Reporting on a running event or our club (e.g. in the media, on our website)	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications (e) Health, potentially (f) Sporting Data (g) Photographic	(a) Performance of a contract with you, if any (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how individuals use our events or club, undertake our running events as well as to report on our running events)
To administer and protect our club (including troubleshooting, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our club, provision of administration and IT, network security, to prevent fraud) (b) Necessary to comply with a legal obligation

Marketing

We will only provide marketing to you concerning our running events or club.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us concerning a particular running event.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with the External Third Parties as set out in the Glossary for the purposes set out in the table Purposes for which we will use your personal data above. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

We do not transfer your personal data outside the UK.

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those individuals who have a business need to know. They will only process your personal

data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal or regulatory requirements. Typically the retention period is 3 years from when that personal data was provided. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. Race results are a public record and will not ordinarily be deleted by us.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory or other requirements.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data, namely: (i) Request access to your personal data, (ii) Request correction of your personal data, (iii) Request erasure of your personal data, (iv) Object to processing of your personal data, (v) Request restriction of processing your personal data, (vi) Request transfer of your personal data, and (vii) Right to withdraw consent. If you wish to exercise any of the rights set out above, please contact us using the contact details above.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

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.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our club in conducting and managing our club to enable us to give you the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party (if any) or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

EXTERNAL THIRD PARTIES

- Service providers who provide IT and administration services (for example the online hosted Entry Central (for race entries), online hosted Mailchimp (for race emails) and postal companies (for post). The privacy policy for Entry Central is available at <https://www.entrycentral.com/terms-and-conditions/privacy> and the privacy policy for Mailchimp is under <https://www.intuit.com/privacy/statement/>.
- Professional advisers including lawyers who provide legal services to us.
- Medical providers at race events we organise.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some

cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain things to you. We will advise you if this is the case at the time you withdraw your consent.