



KOSMO
SHOTOKAN
Karate Club

PRIVACY POLICY

V1.0

July 2020

Learn. Strive. Inspire.

What is this privacy notice/policy?

This Data Privacy Notice/Policy describes the categories of personal data Kosmo Shotokan Karate Club process and for what purposes. Kosmo Shotokan Karate Club are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

This Privacy Notice/Policy applies to members, parents/guardians of youth members, volunteers, employees, contractors, suppliers, supporters, donors and members of the public who will make contact with Kosmo Shotokan Karate Club.

Who we are

The Data Controllers for Kosmo Shotokan Karate Club are the owners of the club.

From this point on Kosmo Shotokan Karate Club will be referred to as “we”.

The club Data Protection Officer is James Pugh.

The data we may process

The majority of the personal information we hold, is provided to us directly by you or by the parents or legal guardians of youth members verbally or in paper form, digital form or via our online membership system Online Club Manager. In the case of adult members and volunteers, data may also be provided by third parties, such as the Disclosures and Barring Service.

Where a member is under the age of 18, this information will only be obtained from a parent or guardian and cannot be provided by the young person.

We may collect the following personal information:

- Personal contact details such as name, title, address, telephone numbers and personal email address - so that we can contact you.
- Date of birth - so that we can ensure young people are allocated to the appropriate Section for their age and that adults are old enough to take on a role with the club.
- Gender – so that we can address individuals correctly and accommodate for any specific needs.
- Emergency contact information - so that we are able to contact someone in the event of an emergency.
- Government identification numbers e.g. national insurance, driving licence, passport - to be able to process volunteer criminal record checks.
- Bank account details, payroll information and tax status information - so that we are able to pay any staff that might be employed by us and collect gift aid from HMRC where donations are made.



- Training records - so that members can track their progression through the grading system or adult training requirements.
- Race or ethnic origin - so that we can make suitable arrangements based on members cultural needs.
- Health records - so that we can make suitable arrangements based on members medical needs.
- Criminal records checks - to ensure the Karate Club is a safe space for young people and adults.
- Safeguarding Information – We may hold confidential data in our Safeguarding Management system, Impero Back:Drop

The lawful basis we process your data by

We comply with our obligations under the GDPR and DPA 2018 by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our adult volunteers and legitimate interest for personal data of our youth members. Sensitive (special category) data for both adult volunteers and our youth members will mostly align to the lawful basis of legitimate activities of an association. More information on our photography policy is detailed within our Photography policy.

We use personal data for the following purposes:

- To provide information about activities, training, courses and events to our members .
- To administer membership records
- To manage our team
- To maintain our own accounts and records
- To inform you of news, events, activities and services being run or attended by Kosmo Shotokan Karate Club, or our partner organisations
- To ensure and evidence your suitability if undertaking a role which requires such checks
- To contact your next of kin in the event of an emergency
- To ensure you have and maintain the correct qualifications and skills.

We use personal sensitive (special) data for the following purposes:

- For the protection of a person's health and safety whilst in the care of Kosmo Shotokan Karate Club
- To respect a person's religious beliefs with regards to activities, food and holidays
- For equal opportunity monitoring and reporting.
- To report or monitor, where necessary incidents and concerns to the relevant persons



Our retention periods

We will keep certain types of information for different periods of time, below is a table detailing more information

General Membership Information	<p>Data is kept until 7 years after a member turns 18, or is continued to be held if they remain with the club.</p> <p>If a member under 18 leaves the club, their data will be archived until 7 years after they turn 18.</p> <p>If a member over 18 leaves the club, their data will be archived for 5 years before being removed from our system.</p> <p>We may keep general statistical information, such as how many members have graded to a certain belt, indefinitely.</p>
Information relating to an incident or specific concern (such as safeguarding or first aid information)	<p>Data is kept until 7 years after a member turns 18, or is continued to be held if they remain with the club.</p> <p>If a member under 18 leaves the club, their data will be archived until 7 years after they turn 18.</p> <p>If a member over 18 leaves the club, their data will be archived for 5 years before being removed from our system.</p>

Our data partners may store data for different periods of time within their own systems, you should check with them should you have any questions regarding their retention policy.



How we store your personal data

We generally store personal information in the following ways:

Online Club Manager - is the online membership system of Online Youth Manager, this system is used for the collection and storage of youth member personal data.

Impero Back:Drop – is our Safeguarding and Incident management system, this system is used for the monitoring of First Aid, Incidents and Safeguarding Concerns.

GoCardless – is the system responsible for handling our Direct Debits, and works in partnership with Online Youth Manager.

Website – details after you place an order on our website are stored within our website for sales monitoring purposes.

GSuite – our email system. Communications are logged through here, as well as various other documents, such as a copy of your license agreement are stored using Google Drive.

In addition, we may hold some personal data on local spreadsheets/databases.

Printed records and data held while attending events - paper is sometimes used to capture and retain some data for example:

- License agreements
- Event registration
- Health and contact records forms (for events)
- Events coordination with event organisers

Paper records for events are used rather than relying on secure digital systems, as often the events are held where internet and digital access will not be available. We will minimise the use of paper to only what is required for the event. Paper records will be destroyed as soon as possible after use.

Copies of various agreements you have made with the club are securely held in Google Drive.



Third Parties

We may, with your explicit consent use some personal and personal sensitive data, to generate income. We will never do this without your explicit consent.

We may, without asking for consent, pass some personal and personal sensitive data onto third parties such as:

- Our Insurers
- Hertfordshire Safeguarding Children Partnership (including MASH Teams, LADO, Local Police, NSPCC, NHS and various other connected bodies)
- Hertfordshire Safeguarding Adults Board
- Local Medical Authorities (Such as NHS or your GP)

Your Rights

As a Data Subject, you have the right to object to how we process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information we use. In addition, you have a right to complain to us and to the Information Commissioner's Office (www.ico.org.uk)¹².

Unless subject to an exemption under the GDPR and DPA 2018², you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by us.
- The right to access your personal data – you can ask us to share with you the data we have about you. This is a Data Subject Access Request. (Information on here may not include sensitive Safeguarding Data, if it would pose a risk to any individuals)
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing. Members will be able to edit and update some information directly on Online Club Manager
- The right to erasure – this means that you have the right to request that we delete any personal data we have about you. There are some exceptions, for example, some information will be held by us for insurance, compliance or legal reasons.
- The right to restrict processing – if you think that we are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask us we will have to share your data with you in a way that can be read digitally – such as a pdf. This makes it easier to share information with others.
- The right to object – you can object to the ways your data is being used.
- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by us



Website Cookies

Forms related cookies

When you submit data through a form such as those found on our contact pages or comment forms, cookies may be set to remember you your user details for future correspondence.

Third Party Cookies

In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.

This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

For more information on Google Analytics cookies, see the official Google Privacy information [page](#).

