



# London Warriors American Football Club

## *Privacy Notice*

The London Warriors American Football Club ("London Warriors", or "the Club") values everyone's privacy. This notice explains how and why we collect and use personal information (or "data") about players, volunteers, staff, and others, and what we do with that data.

Under the General Data Protection Regulation (GDPR), you have specific rights regarding your data. The London Warriors American Football Club, of 124 City Road, London EC1V 2NX, is the Data Controller for the purposes of GDPR, and uses data in accordance with data protection laws.

Personal data means any information relating to you, or that can be used to identify you. It includes information like your name, address, email, CCTV images, photos, videos, and online identifiers such as IP addresses and cookies.

### **Data Protection Officer**

You can contact our Data Protection Officer at [dpo@londonwarriors.org.uk](mailto:dpo@londonwarriors.org.uk).

### **How and why we collect and use personal information**

We collect and use personal data to:

- Safeguard and promote the welfare of our players
- Support player development to help them fulfil their potential
- Manage our club and teams effectively
- Manage our staff
- Generate charitable income and marketing
- Understand our customer base and to develop and grow our business

Players (or their parents/guardians if under 18) provide information about themselves when completing membership forms, health and medical record forms and photographic consent. Personal information is also collected directly from players and parents/guardians by direct means such as meetings, discussions, during training and in general correspondence. In some cases, personal data may be supplied to us by third parties, for example another Club, BAFA (the National Governing Body), a local authority or other professionals.

We do not collect personally identifying information for sale to third parties.



## Child-friendly Privacy Notice

A child-friendly version of this notice can be found [here](#).

### 1. Safeguard and promote the welfare of our players

The safety and welfare of our players will always be our overriding concern. We record and monitor information on player attendance and absence, and may record and process information about our players' personal and social development in order to direct them to appropriate pastoral support. We may share information in accordance with legal requirements and Government guidance, with third parties such as regulators, local authority children's services, the courts or the police.

### 2. Support player development to help them fulfil their potential

We record and process information to monitor and assess player progress and development and help them to reach their potential on and off the field, for example:

- Baseline assessments that support tracking and demonstrate progress: giving measures of an individual's potential, progress and improvement through their time with the Club
- Diagnostic assessments to help inform the Club to improve player outcomes
- Video footage of training sessions, or of our games as a teaching aid to support your coaching and performance development, or to be able to provide highlights for recruitment purposes to help players progress within the sport.

We may share information with the National Governing Body where there is a statutory basis for doing so, or with authorised third parties to access services that support the improvement of outcomes.

### 3. Managing our Club and Teams effectively

We use data to support the day-to-day management of our Club and Teams, for example keeping attendance registers, organising and monitoring player activities, providing sporting and education services and providing IT services.

We may share data between parents/guardians, players and others where this is necessary and there is a legitimate interest in doing so (see below in " Legal grounds for processing data ").

#### Club membership applications

An application to join the Club must be made by a player, or by a person with parental responsibility in the case of a prospective player under the age of 18. Applicants must provide personal information about themselves (and the child they are applying for), including name, date of birth, contact details and address. We ask for this information so that we can process your membership.



We will also ask for information like details of medical history and dietary needs, so that we can provide appropriate care to our players. We may share this information with authorised third parties if we believe this is necessary and in an individual's best interest, for example in the event of a medical emergency.

We may also ask for information on nationality, ethnicity and any individual needs a player might have to ensure we can make an effective provision for them, and also to provide statistical information.

### **Financial information**

We may ask for and hold the details of those who will pay any membership fees due.

### **Photographs and video**

We may take photographs of players to identify them in our records. We may also take photographs or record video during practice sessions, games, organised events or trips where this supports the delivery and improvement of our provision, supports players' learning and development, or for marketing purposes.

Where we wish to use these for marketing purposes, for example on our website, social media or within Club publications, we will only do this if we have a separate consent. Depending on the nature of the consent we are asking for, and the age and understanding of the player, we may ask for our players for their consent, or a parent/guardian, or both.

## **4. Managing our staff (volunteers)**

### **Collection of staff data**

We may collect a range of information from staff. This may include personal details such as contact details, date of birth and proof of identification. We may also require third party references, and may also collect information relevant to the role, such as qualifications, training courses and education.

Some data is collected directly from staff, or from prospective staff as part of our recruitment process. Other personal data may be collected from third parties, such as references, or DBS and identity checks via an external identity checking service, or from the National Governing Body.

### **Information about criminal convictions**

We may need to check staff details against the national criminal conviction database by doing a Disclosure and Barring Service check where it is appropriate given the nature of a volunteering role and where we are legally permitted to do so. If it is appropriate and legal, we may also collect this kind of information in the course of volunteering for us, but it may also be provided to us directly by you or others.

We will use information about criminal convictions and offences in the following ways:

- To determine, without discrimination, your suitability for the role
- To continue to ensure you are still suitable for the role, including by means of continual screenings, where appropriate



### **Failing to provide personal information**

Failure to provide certain information when requested may prevent us from complying with our legal obligations (such as ensuring the safety of our players and volunteers) and we may not be able to process your application to volunteer with us, offer you certain volunteering opportunities or keep you on as a volunteer.

### **Management responsibilities**

We record information that enables us to support the professional development and progression of our staff and to assess and help them improve their performance, and the performance of their areas of responsibility.

## **5. Generating charitable income and marketing**

With your consent, we may use your information to update you about Club news, events, and opportunities to support our provision.

As a fundraising organisation, we undertake in-house research to identify potential donors and may use the information you have provided along with other public sources of information to get a better understanding of who you are, so that our communications can be best tailored to you, as well as your likely interests and concerns. This helps us target our resources as effectively as possible, which our stakeholders and alumni tell us is important for them.

We hold the data of our supporters securely and your personal information will not be sold or shared to any person or organisation outside the Club.

## **6. Understanding our customer base to develop and grow our business**

We use personal information to understand our customer base and advertise our business. This may involve sharing your data with third-party providers who analyse and match it with other data to identify preferences, interests, and characteristics. This helps us promote activities to similar audiences.

### **Undertaking due diligence**

We may employ third-party services to comply with anti-money laundering and other legal regulations, including Charity Commission rules on donations. These services help us assess risks, avoid proceeds of crime and protect our reputation. For instance, your data may be checked against global sanctions, regulatory and law enforcement lists and other public sources.



## Legal grounds for processing data

We process data where one or more of the following applies:

### Legitimate interests

This means that the processing is necessary for legitimate interests pursued by the Club, unless this would override your fundamental rights, considering your reasonable expectations. We rely on legitimate interests for many of the ways in which we process personal information, including providing our sporting and educational provision to our players, managing our Club effectively and working with our volunteers.

### Necessary for a contract

Personal information may be processed to perform our obligations under contract, or to gather information before entering a contract. For example, we need your name and contact details so that we can contact you if there is a concern, or so that we can process information about membership fees. We also process the personal information of our staff and volunteers.

### Legal obligation

Personal information can be processed as part of our duty to comply with a number of legal obligations. Legal obligations can relate to safeguarding, health and safety or to the National Governing Body or the Government. Where necessary we may have to share personal information with other service providers, such as insurers and professional advisers.

### Vital interests

We may process personal information if we believe this is necessary to protect an individual's vital interests. This might include health information with medical professionals providing treatment or sharing allergy information with third party caterers.

### Consent

Where none of these conditions apply and we still wish to process your personal information we will ask for your consent. Depending on the nature of the consent we are asking for, and the age and understanding of the player, we may ask for our players for their consent, or a parent/guardian, or both.

If we ask for consent, we will be clear about what we are asking to do with your personal information. Where we are relying on consent to process personal information you may withdraw your consent at any time. Please note that we may need to continue to process personal information under one of the other grounds set out above.



## Our legal basis for processing special categories of personal data

Data protection legislation also refers to "special categories of personal data", which is more sensitive personal information that requires a higher level of protection. This includes data revealing racial or ethnic origin, trade union membership, and the processing of biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. We take extra care when processing this type of information and will only process this type of information when one of the following applies:

### Data concerning health

We record information on the health of our players where this is necessary to ensure the safety and fulfil our legal obligations. We may also collect similar data on staff and volunteers. We may record and process information on health in the following areas:

- **Safeguarding:** it may be necessary for us to record information on the physical or mental health of our players and share this with health or social care professionals to ensure our players receive appropriate health or social care treatment
- **Medical care:** we record information on any pre-existing health and medical issues of our players, and any issues they experience within our care and treatments. This is to make appropriate provisions for health and medical treatment. In a medical emergency we may share information with other parties, such as ambulance staff or a hospital if we believe it is in an individual's best interests and they are unable to provide this themselves
- **Pastoral care:** we may record information concerning the social, psychological or physical development of our players and this may include information concerning their health, to support appropriate local authority children's services referrals

### Ethnicity data of Players

We may collect information on the ethnicity of players for reporting purposes, for example to provide our funders information on the impact of their funding, or to target specific support and interventions to players.

## How long do we keep personal information?

We retain personal information as long as needed to provide our services and activities in line with the law. Even after players or volunteers leave the Club, we may keep some data, for example safeguarding information. Certain information may be kept longer for historical, research, or statistical purposes, although we will do this in a manner that complies with applicable data protection law.

## Automated decision making

We will not use your personal information for automated decision making or profiling.



## Your legal rights

### Your right of access

You have the right to ask us for copies of your personal information. There are some exemptions, which means you may not always receive all the information we process. You can read more about this [here](#).

### Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. You can read more about this [here](#).

### Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances. You can read more about this [here](#).

### Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. You can read more about this [here](#).

### Your right to object to processing

You have the right to object to the processing (use) of your personal data in some circumstances. You can read more about this [here](#).

### Your right to data portability

You have the right to ask that we transfer information you have given us from one organisation to another, or give it to you. The right only applies if we are processing information based on consent or under, or in talks about entering into a contract and the processing is automated. You can read more about this [here](#).

## Contact us

**Please contact us at [dpo@londonwarriors.org.uk](mailto:dpo@londonwarriors.org.uk) if you wish to exercise any of these rights, or if you have any questions or queries about the way your personal data is processed by us.**

If we need more details to locate your data or confirm your identity, we will ask for additional information. We will process your request only after receiving all necessary details. For third-party requests, we may require proof of authority, where it is the third party's duty to provide this evidence.

Accessing your personal data is free, but we may charge a fee if your request is unfounded, repetitive, or excessive. In such cases, we may also refuse to comply with your request. We aim to respond to all valid requests within one month. Complex or multiple requests might take longer. We will keep you informed.

You can file a complaint with the Information Commissioner's Office (ICO), the regulatory body that oversees data rights. More details on how to complain are available [here](#).