



GBS Data Protection Policy

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Definitions

“Data Subject”	means any Individual whose Personal Data is being collected, held, or processed;
“DPA”	means the Data Protection Act 2018;
“DPO”	means the GBS Data Protection Officer;
“Email”	means any email address and all functions accessible by that address, including messages distributed by electronic means from one computer user to one or more recipients via a network;
“FIS”	means the International Ski Federation;
“GBS”	means GB Snowsport Ltd.;
“GBS Athlete”	means athlete who is part of a GBS Team/GBS Squad;
“GBS CEO”	means the Chief Executive of GBS;
“GBS Member”	means Individuals who are subscribed to be a part of GBS membership; this includes FIS/IPC licence holders;
“GBS Social Media Accounts”	means the active accounts GBS have on different Social Media platforms such as Twitter and Instagram;
“GBS Staff”	means staff who are employed by, or acting as a consultant, to GBS;
“GBS Volunteer”	means volunteers who work for GBS without pay;
“GBS Website”	means the official GBS website, https://www.gbsnowsport.com/ ;
“GDPR”	means the General Data Protection Regulation (EU) 2016/679;
“ICO”	means the Information Commissioner’s Office;
“Individual”	means anyone who is subject to the Policy;

“Internet”	means the system of connected devices that allows communication or the transfer of information, whether it be on a private or public network;
“Personal Data”	means any data that can be used to identify an Individual, such as a name, home address, or credit card number;
“Social Media”	means all forms of social media that exist now or may exist in the future. This includes (but is not limited to) Facebook, Twitter, YouTube, Instagram, Tumblr, LinkedIn, WhatsApp, Snapchat, Tinder, Flickr, Pinterest, Google+ and all other social networking websites, all other internet posting sites, blogs, and forums;
“Special Categories”	means the special category personal data outlined within the GDPR;
“Third Party”	means any Individual or organisation and includes actual and potential clients, suppliers, distributors, business contacts, agents, advisors, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

1. Introduction

- 1.1. This document contains the GB Snowsport (GBS) Data Protection Policy (the “Policy”). The Policy will describe how your Personal Data will be collected, handled, and stored to both meet GBS’ data protection standards and to comply with the relevant law.
- 1.2. GBS will collect Personal Data about GBS Staff, GBS Athletes, GBS Volunteers, and GBS Members when applying for either a role with us or a place on a GBS Team, a GBS Squad, or a programme run by GBS, a licence or request to compete internationally which is issued by GBS, or a membership or Email communication service run by GBS.
- 1.3. GBS collects this Personal Data through Email interaction with you or through data collection forms on the GBS Website. If you use our secure services we will ask you to provide some information about yourself for security, identification, and verification purposes.

Aims

- 1.4. To comply with relevant data protection law, such as the DPA and the GDPR and to follow good practice.
- 1.5. To protect the rights of GBS Staff, GBS Athletes, GBS Volunteers, GBS Members and anyone working on behalf of GBS.

Scope

- 1.6. The Policy is to be followed by all GBS Staff, GBS Athletes, GBS Volunteers, GBS Members and anyone working on behalf of GBS.
- 1.7. The Policy applies to all data that GBS may hold relating to identifiable Individuals even if that information technically falls outside of the DPA or GDPR. This may include details such as names of Individuals, postal and Email addresses, telephone numbers, medical information, and GBS contacts.
- 1.8. Failure to comply with the Policy will lead to disciplinary action in line with the GBS Disciplinary Policy. If your conduct is unlawful or illegal you may be personally or criminally liable with respect to civil and/or criminal proceedings, claims, or actions.
- 1.9. GBS recognises its legal obligations under both the GDPR and the DPA and will abide by its requirements, as well as any equivalent legislation (as amended) in any UK jurisdiction, Jersey, Guernsey, or the Isle of Man and any later amendments to such legislation or subsequent related legislation that may be relevant to GBS.

- 1.10. The Policy is designed to be read in conjunction with the GBS Data Breach Policy. Documents may receive revisions and updates occasionally, with the most up to date versions being available on the GBS Website.

2. Data Protection Law

- 2.1. The DPA is the main piece of legislation that describes how organisations such as GBS must collect, handle, and store the Personal Data of GBS Staff, GBS Athletes, GBS Volunteers, GBS Members and anyone working on behalf of GBS.
- 2.2. The rules under the DPA apply regardless of whether Personal Data is stored electronically, on paper, or on other materials.
- 2.3. The DPA states as follows. Personal Data must be:
 - 2.3.1. used fairly, lawfully, and transparently;
 - 2.3.2. used for specified, explicit purposes;
 - 2.3.3. used in a way that is adequate, relevant, and limited to only what is necessary;
 - 2.3.4. accurate and, where necessary, kept up to date;
 - 2.3.5. kept for no longer than is necessary;
 - 2.3.6. handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction, or damage.

Special Category Personal Data

- 2.4. The processing of these Special Categories are restricted by further safeguards to give extra protection to the privacy of Data Subjects. This type of data could create more significant risks to a person's fundamental rights and freedoms. For example, by putting them at risk of unlawful discrimination. The Special Categories consisting of information related to an Individual's:
 - 2.4.1. race;
 - 2.4.2. ethnic origin;
 - 2.4.3. politics;
 - 2.4.4. religion;

- 2.4.5. trade union membership;
 - 2.4.6. genetics;
 - 2.4.7. biometrics (where used for ID purposes);
 - 2.4.8. health;
 - 2.4.9. sex life; or
 - 2.4.10. sexual orientation.
- 2.5. Personal Data relating to criminal convictions and offences are not included as Special Categories, but similar extra safeguards apply to its processing.

The Risks

- 2.6. The Policy aims to protect GBS and GBS Staff, GBS Athletes, GBS Volunteers, and GBS Members from data security risks. Including:
- 2.6.1. breaches of confidentiality (information being given out inappropriately);
 - 2.6.2. breaches of contract (a contract cannot be completed because necessary data was lost or corrupted);
 - 2.6.3. failing to offer choice (all Individuals should be free to choose how the company uses data relating to them);
 - 2.6.4. reputational damage (GBS could suffer if hackers successfully gained access to sensitive data);
 - 2.6.5. financial penalty (a data breach results in a fine from the ICO).

3. Your Rights

3.1. The GDPR gives Individuals eight rights relating to their Personal Data. GBS has processes in place to ensure that it can facilitate any request made by an Individual to exercise their rights under data protection law. All requests will be considered without undue delay and within one month of receipt as far as possible.

3.2. The Individuals who have these rights include any living Individual whose Personal Data is collected, held, or processed by GBS.

The Right to be Informed

3.3. Individuals may be told what Personal Data is being collected, how it's being used, how long it will be kept and whether it will be shared with any Third Parties. This information will be communicated concisely and in plain language.

The Right of Access

3.4. Individuals can submit subject access requests, which oblige organisations to provide a copy of any Personal Data they hold concerning the Individual. GBS will produce this information within one month, although there are exceptions for requests that are manifestly unfounded, repetitive, or excessive.

The Right to Rectification

3.5. If an Individual discovers that the information we hold on them is inaccurate or incomplete, they can request that it be updated. As with the right of access, GBS will update the information concerned within one month.

The Right to Erasure

3.6. Individuals can request that we erase their Personal Data in certain circumstances, such as when the Personal Data is no longer necessary, the Personal Data was unlawfully processed, or it no longer meets the lawful ground for which it was collected. This includes instances where the Individual withdraws consent. The right to erasure is also known as 'the right to be forgotten'.

The Right to Restrict Processing

3.7. Individuals can request that we limit the way GBS uses Personal Data. It's an alternative to requesting the erasure of Personal Data, and might be used when an Individual contests the accuracy of their Personal Data or when they no longer need the information but we require it to establish, exercise, or defend a legal claim.

The Right to Data Portability

3.8. Individuals are permitted to obtain and reuse their Personal Data for their own purposes across different services. This right only applies to Personal Data that an Individual has provided to data controllers by way of a contract or consent.

The Right to Object

- 3.9. Individuals can object to the processing of Personal Data that is collected on the grounds of legitimate interests or the performance of a task in the interest/exercise of official authority. We must stop processing information unless we can demonstrate compelling legitimate grounds for the processing that overrides the interests, rights, and freedoms of the Individual or if the processing is for the establishment or exercise of defence of legal claims.

Rights Related to Automated Decision Making Including Profiling

- 3.10. The GDPR includes provisions for decisions made with no human involvement, such as profiling, which uses Personal Data to make calculated assumptions about Individuals. There are strict rules about this kind of processing, and Individuals are permitted to challenge and request a review of the processing if they believe the rules aren't being followed.

4. GBS Data Use

Use of Your Data

- 4.1. We will only collect Personal Data that is relevant to employing GBS Staff or GBS Volunteers in a voluntary or remunerated role, running GBS Teams or GBS Squads, providing you with a FIS Licence, entry into competitions, processing your membership, or providing you with information about our GBS Athletes and their successes.
- 4.2. We will keep your Personal Data for as long as permitted for our legitimate business purposes and for any retention period that we are legally required to meet.
- 4.3. We may sometimes need to transfer your Personal Data to Third Parties who provide services to us, on the understanding that they keep the Personal Data confidential and use it only for our agreed purposes. When transferring Personal Data to a Third Party located outside of the United Kingdom, we will ensure a level of data protection that is equal to the one in the European Economic Area.
- 4.4. When we use standard Email to communicate with each other we cannot guarantee that it remains confidential whilst in transit. However, when we receive an incoming Email, that Email and the Personal Data attached or contained within it will be stored on either physical or cloud based secure servers.

Information We May Hold

- 4.5. GBS may hold the following details about GBS Staff, GBS Athletes, GBS Volunteers, and GBS Members:
 - 4.5.1. Personal Data, such as names, addresses and dates of birth, including Personal Data you provided to GBS when you applied for a role, a programme or GBS Squad place, or a licence or competition, or signed up to a membership programme or other service GBS provides;
 - 4.5.2. details of Individuals' career and experience; and
 - 4.5.3. details of Individuals' sporting success and performance.
- 4.6. GBS may also use Personal Data submitted on the GBS Website for the purposes specified in the relevant part of the GBS Website and for other purposes for which you give your consent. We will not pass your Personal Data to any Third Party outside the organisation except for the reasons explained in Clause 4.11. We may collect, store and use the following kinds of Personal Data:
 - 4.6.1. information about your visits to and use of the GBS Website, e.g. IP address, browser type, referral source, length of your visit, and number of pages viewed. This information may be used for the administration of the GBS Website in order to improve the usability of the site; and
 - 4.6.2. information that you provide to us for the purposes of registering with us and/or subscribing to our services as mentioned above.
- 4.7. Please note that the use of the Internet to transfer information is not secure. We do our best to maintain security within the GBS Website and to safeguard your Personal Data, however, we cannot ensure or warrant the security of any information which you may transmit to us.
- 4.8. If you provide us with your Personal Data, we will keep the information for as long as is necessary to comply with any statutory or legal obligations.

Sharing Your Details

- 4.9. GBS may publish information about you on the GBS Website or on any GBS Social Media Accounts.
- 4.10. By entering in to your relationship with GBS, you acknowledge that GBS may publish this information. If you wish GBS to remove any item that it has published via the GBS Website or GBS Social Media Accounts then you may write to info@gbsnowsport.com.

- 4.11. GBS will only share your Personal Data with other organisations in order to fulfil its requirements for its relationship with you. Wherever we do share your Personal Data, we will always attempt to ensure that GBS Partners and service providers apply the same standards of security and care to your Personal Data as we will do.

5. Accessing Held Information

- 5.1. You have the right to see and receive a copy of any Personal Data we may hold on you.
- 5.2. You have the right to have a say in how we use this Personal Data, specifically regarding targeted sales profiling. For example, if we are sending you special offers based on preferences that you have provided to us, then you have the right to refuse these specific Emails.
- 5.3. To request a copy of the Personal Data we hold on you, please write to info@gbsnowsport.com.
- 5.4. One of the ways we protect your confidentiality is to check that anyone asking for Personal Data has the right to receive it. At times, we may ask you to prove further details about your identity and we will always require your written authority before making information available to you.
- 5.5. You should not allow Third Parties to persuade you into disclosing Personal Data without proper authorisation. For example, GBS Athletes' parents do not have an automatic right to gain access to their child's Personal Data.

Rectification

- 5.6. You have the right to have any inaccurate information corrected or your Personal Data removed from GBS' files (subject to legal requirements). To request an amendment to your details or removal of your Personal Data please write to info@gbsnowsport.com.

Reporting a Breach

- 5.7. The DPA requires that we report to the ICO any Personal Data breach where GBS deem there is a risk to the rights and freedoms of the Data Subject.

- 5.8. Where the Personal Data breach results in a high risk to the Data Subject, he/she also has to be notified unless subsequent steps have been taken to ensure that the risk is unlikely to materialise, security measures were applied to render the Personal Data unintelligible (e.g. encryption) or it would amount to disproportionate effort to inform the Data Subject directly. In the latter circumstances, a public communication must be made or an equally effective alternative measure must be adopted to inform Data Subjects, so that they themselves can take any remedial action.
- 5.9. We have put in place procedures to deal with any suspected Personal Data breach and will notify Data Subjects or the ICO where we are legally required to do so.
- 5.10. If you know or suspect that a Personal Data breach has occurred, you should immediately contact the GBS CEO and follow the instructions in the GBS Data Breach Policy. The DPO will maintain a record of such breaches, as required by the GDPR.

6. Record Keeping

- 6.1. The GDPR requires us to keep full and accurate records of all our data processing activities. GBS will keep and maintain accurate records reflecting our processing.
- 6.2. These records should include, at a minimum, the name and contact details of the DPO, clear descriptions of the Personal Data types, Data Subject types, processing activities, processing purposes, Third Party recipients of the Personal Data, Personal Data storage locations, Personal Data transfers, the Personal Data's retention period, and a description of the security measures in place.

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