

PRIVACY POLICY

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1. PURPOSE OF DOCUMENT

This Privacy Policy describes how personal data we collect from our members and other users of our services will be collected, stored and processed.

This policy is to be read in conjunction with the British Fencing Website Privacy Statement which describes how data is collected and used on the British Fencing Website.

2. INTRODUCTION

British Fencing Association Ltd. (BF) is a private company limited by guarantee, incorporated and registered in England and Wales with company number 1917099. For the purpose of the Data Protection Act 2018, the data controller is British Fencing Association Ltd.

BF is the owner of www.britishfencing.com and the website which it maintains.

BF is committed to protecting your privacy and processing your personal data in accordance with the Data Protection Act 2018, the UK GDPR (as defined in the Data Protection Act 2018) and, to the extent applicable, the General Data Protection Regulation. This policy explains how the information we collect about you is used and kept securely.

3. THE INFORMATION WE COLLECT ABOUT YOU

3.1 WHEN USING OUR WEBSITE, OR INTERACTING WITH US VIA EMAIL AND TELEPHONE

We may collect the following information about you through our website at www.britishfencing.com:

- Your name, email address, postal address and any other information you voluntarily provide to us via our website and online forms.
- Your IP address (which is a unique identifier that computers and devices use to identify and communicate with each other) which is automatically recognised by the web server.

For further information with regards to the information we collect from you when you use our website please see our [privacy statement](#).

3.2 WHEN BECOMING A MEMBER

By joining British Fencing as a member you are joining British Fencing Association Ltd (and your Home Country Association) and you or your legal guardian agree to the member being bound by all relevant rules, codes and policies governing the activities and conduct of the membership including,

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without limitation, the Byelaws, Technical Regulations, Codes of Conduct, Child Protection and Anti-Doping Policies of The Associations. Codes of conduct and other relevant policies can be found here - <https://www.britishfencing.com/policy-zone/codes-of-conduct/>.

Our online membership portal is hosted by Sport:80. The privacy policy that relates to use of the Sport:80 portal can be found here: https://bf.sport80.com/policies/privacy_policy

When you register with us as a member you will create an online account on our membership portal which includes a section for your subscription preferences.

If you choose to become a member we will collect the following information about you through our online membership portal at <https://bf.sport80.com>

- Name, date of birth, gender, email address, address, contact telephone numbers, affiliated Home Country, affiliated Region, affiliated clubs with which you are registered, whether or not you are a student and if so, at which University. We will also assign you a unique Membership number.
- You will be given the option to provide your ethnicity which will be used anonymously for equality reporting.
- You will be given the option to provide information on any disability that you have which will be used anonymously for equality reporting.
- You will be given the option to share your disability information with event organisers which will be used by them to plan for any additional assistance you may need at an event you register for.
- You will be given the option to provide a profile image. This may be used for event accreditation and licensing purposes and passed onto the European Federations (EFC) and International Federations (FIE) should you make an application to those bodies for licensing. These profile images may also be used in announcements and on the website when participants are selected for BF teams and programmes,

(together, **Fencing Data**).

We may also use the online membership portal to collect and store the following data

- The status of and/or copies of any coaching, workforce or officiating licenses, qualifications and certificates that you hold
- Information that we need to process any European and World Governing Body licences on your behalf
- Information that is required to arrange accommodation or travel on your behalf if you participate in BF/GBR squad activities.
- Information that is required to deliver membership and programme services

You may also choose to provide us with other information on your online user profile which is accessible to you online at all times you hold a valid membership.

3.3 WHEN REGISTERING AS WORKFORCE AND/OR JOINING A PROGRAMME

In addition to the information that all members supply to us, you may provide us with personal data as part of applying for or participating in teams or programmes or appearing on BF registers.

This may include, but is not limited to, additional contact information, training and competition plans, medical/fitness information, emergency contact information, images (photographic or video), skills, qualifications, criminal record check id numbers. The purpose of collecting this information is to support participation – eg use of video analysis in performance programmes –, to enable us to provide services to you and to confirm minimum registration standards are in place.

3.4 WHEN PARTICIPATING IN AN EVENT OR ACTIVITY

You may provide us with personal data as part of applying for or participating in events or activities.

This may include, but is not limited to, additional contact information, training and competition plans, medical/fitness information, emergency contact information and images (photographic or video).

Where these activities or events are open to non-members:

- We may additionally collect your name, date of birth, gender, email address, address, contact telephone numbers,
- You may be given the option to provide your ethnicity which will be used anonymously for equality reporting.
- You may be given the option to provide information on any disability that you have which will be used anonymously for equality reporting.
- You may be given the option to share your disability information with event organisers which will be used by them to plan for any additional assistance you may need at an event you register for.

Occasionally, we take photos or videos of fencing activities. We may use these images in commercial materials that we produce, in displays and on our website. We may also make video or webcam recordings for monitoring, evaluation, training and educational purposes.

We also send images to the news media, or our activities/events/competitions may be visited by the media who will take their own photographs or film footage (for example, of a visiting dignitary or other high profile event). People will often appear in these images. The news media may use the images in printed publications (including local or national newspapers), on televised news programmes or on their website. They then store them in their archive. They may also syndicate the photos to other media for possible use, either in printed publications, on websites, or both. When we submit photographs and information to the media, we have no control on when, where, if or how they will be used.

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If you do not want us to use your image or your child's image, please let us know. All BF Championships events will have official photographers and potentially live streaming. Consent for the processing of these images is requested at point of entry. For more information please see Appendix A.

Personal data may also be collected in the event that you are involved in any accidents or disciplinary or safeguarding incidents and any subsequent investigation arising from these.

4. THE INFORMATION PROVIDED TO US BY OTHERS

We may also be provided with information about you from clubs or partners with which you are registered.

In some cases clubs or partners will register you for membership.

That information may include: BF membership number, name, date of birth, gender, email address, address, telephone number, Home Country/Regional affiliations, name of the BF affiliated Clubs with which you are registered and any coaching or officiating licenses that you hold.

5. HOW WE USE YOUR INFORMATION

We will collect and process your personal data **on the basis of legitimate interests** - for the purposes of providing the services that you have requested from us (including registering you as a member of BF), performing the legitimate functions of a National Governing Body and administering your involvement in the sport and also on the basis that processing is **necessary for the performance of a contract** to which you are a party. If you provide us with disability or medical data, we will only process this for the purposes of providing services to you.

On the basis of legitimate interests or where necessary for the performance of a contract to which you are a party, we may use your personal information for a number of purposes, including:

- To deliver the services that form a part of the membership you have.
- To deliver the services that form part of the BF programme/event/activity you are participating in.
- To deal with your requests and enquiries.
- To contact you for reasons related to your enquiry.
- To notify you about fencing events/competitions.

We will process your Fencing Data and any optional data that you supply on the membership portal on the basis of the following legitimate interests:

- The use of Application Programming Interfaces (APIs) to provide external software providers with a facility to check and validate data to support administrative processes. For example:
 - transfer of membership number, name and date of birth via an API to check licence validation at point of entry to fencing events

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- transfer of membership number, name and date of birth to match against competition results
- There is an administration portal where a selected number of staff and volunteers that support administrative functions can access data to help to respond to queries, update data and perform necessary administration activity.
- The regular monitoring of trends in the sport to allow BF to make informed operational decisions and create reports for funders. This relies on a report being run on the system and then downloaded to be analysed and interrogated by a select number of staff. Where possible, these reports will be anonymised before download.
- Providing relevant and necessary information via email, text, post to you about the following:
 - Changes to rules and regulations
 - Information regarding the governance of the sport – eg elections, AGM
 - Updates to advice and guidance relating to specific roles held within fencing
 - Transactional information relating to club affiliation and transfers, athlete registration, representative teams, competition and events, coach and officiating licenses, event licensing, courses, CPD events and qualifications.

When we collect information from you, we will tell you if we would like to send you information about our products and services. We will give you the opportunity to opt in to any such communications and will tell you how you can opt-out at any time.

If you choose to opt-in to additional communication we will use your personal data **on the basis of consent**.

Where you have opted into additional communications either

- A) in your subscription preferences section of your online membership portal, or
- B) by opting into communications through social media, website, responding to emails

we will process your personal data for these purposes on the basis of consent.

Please see the Communications section below for more information.

6. SHARING YOUR INFORMATION

6.1 INDEPENDENT CONTRACTORS (EG COACHES) AND VOLUNTEERS

Much of the work that is performed by British Fencing is performed by a combination of staff, independently contracted coaches and member volunteers. In order to perform their roles, it may be necessary to pass on personal information to people that are not employed directly by British Fencing. Depending on the information requirements of the role that they perform, volunteers and independent contractors may be given access to elements of the membership system.

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For example:

- As part of the GBR selection process, selectors may require access to relevant personal information that you have supplied either as part of taking out membership, or information you have provided to us for the purposes of consideration by the selectors. This may include, but is not limited to, contact information, training and competition plans, medical/fitness information.
- If you participate in development programmes (eg athlete/Talent, coach, referee pathway) or related activities (eg athlete training camps) your relevant personal information that you have provided in relation to your participation in those programmes/activities may be passed to people who are delivering these development services on behalf of BF. This may include, but is not limited to, contact details, training and competition plans, medical/fitness information, emergency contact information.
- If you are selected to represent GBR, BF may appoint people to the roles of Coaches or Team Managers. As part of their duties they may need access to personal information that you have shared with BF. This may include, but is not limited to, medical, passport, visa and emergency contact information.

We will share only what is needed for the purposes of performing BF duties and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose we will only do so where there is an appropriate legal basis for us to do so.

6.2 ADMINISTRATIVE BODIES

If you become a registered member with BF, we will share your Fencing Data with the following bodies as part of the administration of your involvement in the sport:

- Your Home Country Fencing Associations:
 - England Fencing Ltd, Company number 06506009 <http://englandfencing.co.uk/>
 - Scottish Fencing Limited, Company Number SC265956 <http://www.scottish-fencing.co.uk/>
 - Welsh Fencing Limited, Company Number 07583044 <https://www.welshfencing.org/>
 - NI Fencing Ltd, Company number NI603784 <https://www.nifencing.com/>
 - Guernsey Union d'Esime LBG, Company number 49883 www.guernseyfencing.com/
- Selected members of your chosen Fencing Region
- Selected members of your chosen County Fencing Association
- Organisers of events that you enter
- Third party data managers who support BF in managing the sport

BF may also share your personal information with the bodies listed above for the purposes investigation of incidents such as disciplinary issues, accidents and supporting work to safeguard children and vulnerable adults participating in sport.

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We will share only what is needed for those purposes and, where possible, will anonymise the data before sharing. If we would like to share your information for any other purpose we will only do so where there is an appropriate legal basis for us to do so.

If we wish to share your data with third parties (eg event sponsors) for marketing purposes, we will tell you about this and only do so if we get your consent. You can opt out at any time either by notifying us or by updating your privacy preferences on your online membership portal.

BF may also share your personal information with the police and other law enforcement and statutory agencies for the purposes of crime prevention or investigation and supporting work to safeguard children and vulnerable adults participating in sport.

If we disclose your information, we may ask the organisation to demonstrate that the data will assist in the prevention or investigation of crime or that BF is legally obliged to disclose it.

This is done on a strictly case by case basis and through a tightly controlled process to ensure we comply with Data Protection Legislation.

7. PROTECTING YOUR INFORMATION

The data that we collect from you may be transferred to a destination external to BF's own secure network.

By submitting your personal data, you agree to this transfer, storing or processing. We will take all reasonable steps to ensure that your data is treated securely and in accordance with this privacy policy. The Internet is not generally a secure medium for communication and therefore we cannot guarantee the security of any information you send to us over the Internet. We use up-to-date industry procedures to protect your personal information. We also protect the security of your data using Secure Sockets Layer (SSL) encryption technology.

8. RETAINING YOUR INFORMATION

8.1 MEMBERSHIP DATABASE

We will retain your Fencing Data for such time as you are a member registered with us and will then delete your information on a staged basis as follows:

Type of info	Date of deletion
Fencing Data	Twelve years after an individual has not played an active part in the sport.
Name and date of birth, postcode, Home Country	This information will be anonymised after the twelve year period referred to above.
Name, gender, and date of birth where athlete has competed in any ranking tournament and represented GBR at any level	Indefinitely (see results and rankings below)

8.2 RESULTS, RANKINGS AND IMAGES

Where you have participated in a fencing event your result at that event will be stored as a matter of historical record. Where you participate in ranking events and earn ranking points your name will appear in the associated rankings and these are retained by BF as a matter of historical record.

Where images (photos/videos) exist from these events these will also be retained by BF as a matter of historical record.

Results, rankings and selected images will be published on the BF website.

8.3 SELECTIONS

If you are selected for BF and/or GBR squads and teams your name will be stored indefinitely as a matter of historical record and published on the BF website.

If you apply for discretionary selection the information that you supply will be retained by BF for the period of 12 years from the date of decision.

8.4 PARTICIPATION IN BF PROGRAMMES

If you participate in any BF programme (eg Talent Programme, Aspiration Programme, Coach Development) we will retain information for the period of time that you are participating in the programme. Once participation has ceased we will retain the record of your participation. Any other data provided solely for the purposes of participating in that programme will be deleted or anonymised for the purposes of statistical reporting.

8.5 DISCIPLINARY & SANCTIONS

If you are sanctioned as a result of a disciplinary case, we will store your name and your membership number, alongside a copy of the final decision for 12 years from the expiration of the relevant sanction.

We may also publish sanctions (whether arising from disciplinary, grievance, welfare/safeguarding or any other process) applied to persons age 18 or over on the BF website. Sanctions will be removed from the website 12 months after the expiry of the sanction.

Information in regards to a disciplinary case instigated as a result of the outcome of a Safeguarding or Welfare Case Management Group meetings will be retained indefinitely whether or not a sanction is applied. When making reasonable enquiries and carrying out investigations into disciplinary matters, BF may be required to disclose personal data relating to a disciplinary matter with club officials, welfare officers and third parties.

Other information relating to disciplinary cases (whether a sanction is applied or not) will be retained for 12 years from the date of the final decision in relation to that case.

8.6 SAFEGUARDING

Safeguarding case information and concerns will be stored indefinitely. In limited circumstances, where BF considers it appropriate to do so and has identified an appropriate legal basis, BF may disclose safeguarding concerns to welfare officers, club officials and third parties.

8.7 MEDICAL RECORDS

Only in exceptional circumstances will it be necessary for British Fencing to store and access medical records.

Athletes representing GBR will be expected to provide appropriate medical details which will be shared with BF staff members and volunteers with welfare responsibility for the events that the athlete is attending.

Medical records which are a material part of a selection decision will be retained for 7 years.

8.8 CRIMINAL RECORD CHECKS

BF does not typically retain copies of certificates. BF will note the date on which the check has been performed and the status of the check.

In some cases a certificate contains information which impacts a recruitment or registration decision. Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

9. COMMUNICATIONS

9.1 MEMBERSHIP COMMUNICATIONS

We will communicate with you through email, notices posted on our websites and other means. By joining British Fencing you are indicating your consent to receive statutory notices to the email address you supply and accept that you are responsible for updating our records if your email address or other personal details change.

If you are a member of British Fencing you will receive communications about the sport and have a voice about the governance of your sport.

You will therefore automatically receive some key items to the email address you have supplied – including AGM & voting notifications where applicable.

You can opt-in to receiving other partner communications containing news and special offers within your online membership portal.

Where the membership type includes a subscription to the Sword this will be sent to you. If at any time you wish to stop receiving this membership service you can log into your online account and change your settings.

You can also choose to opt-out of receiving The Sword – which is the magazine for BF members delivered as part of the Membership services.

There is some information that you can choose not to receive electronically, please check the appropriate options which can be accessed on your online membership profile. If you believe you have received electronic communications in error please contact British Fencing Head Office immediately so that we can rectify the problem. It is not the intention of British Fencing to send you communication you do not wish to receive. In an effort to keep costs down we may not in all cases be able to provide you with an alternative communication method.

All email messages to or from British Fencing may be monitored to ensure compliance with internal policies and for our mutual protection.

9.2 E-NEWSLETTER

We may use a third party provider to deliver our e-newsletters (eg Club Digest). These e-newsletters can be signed up to via the BF website or social media links. We may use a third party provider/software to deliver our e-newsletters and manage the opt-in/out and unsubscribe facilities.

If you (through the sign-up process) consent to us sending you these types of communications, we will let you know who the third party provider is at that time.

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All newsletters will contain instructions about how to opt-out of that newsletter and also unsubscribe to all similar e-newsletters.

We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletters.

9.3 SURVEYS

We regularly carry out surveys using a third party provider, Survey Monkey (www.surveymonkey.com). These surveys may be accessible through our website.

When we collect your personal data through our website (eg through newsletter sign-ups) we may ask you for your consent to participate in our surveys.

When we collect your personal data through our membership data we will ask whether you wish to receive these surveys.

If you have provided consent to participate, we will transfer your data to Survey Monkey for these purposes only.

In each survey, we will clearly tell you what personal data we are collecting, why we are collecting it and what it will be used for. We will provide a link to terms and conditions for any incentives offered to take part in that survey. We do not link any other information about your browsing activity with the survey data, which is stored separately.

9.4 CLUB AND REGION COMMUNICATIONS

As part of the club/region affiliation process, clubs/regions are required to nominate contacts who will automatically be sent information on behalf of the club.

This information may be in the form of a regular newsletter. If you are the named primary club contact or regional chair and you no longer wish to receive the newsletter you can unsubscribe using the link in the email. **In this situation we strongly recommend that you nominate another primary contact for your club/region to receive relevant information on behalf of your club/region.**

BF is not responsible for the actions or lack of action taken by a club or regional official as a result of unsubscribing from communications.

9.5 OTHER SERVICE AND MARKETING MESSAGES

Our communications may include emails which help inform you about matters relevant to your membership terms and conditions and emails related to the proper functioning of your account.

If you are currently receiving service messages or marketing communications from BF and no longer wish to do so, please let us know by contacting us at headoffice@britishfencing.com.

10. YOUR RIGHTS AND FINDING OUT WHAT INFORMATION BF HOLDS ABOUT YOU

All individuals who are the subject of personal data held by us are entitled to:

- ask what information we hold about them and why
- ask how to gain access to it
- be informed of how to keep it up to date
- have inaccurate personal data corrected or removed
- prevent us from processing information or request that it is stopped if the processing of such data is likely to cause substantial, unwarranted damage or distress to the individual or anyone else
- require us to ensure that no decision which significantly affects an individual is solely based on an automated process for the purposes of evaluating matters relating to him/her, such as conduct or performance
- be informed what we are doing to comply with our obligations under the Data Protection Act 2018.

This right is subject to certain exemptions which are set out in the Data Protection Act 2018.

Under data protection legislation, you can ask to see any personal information that we hold about you. Such requests are called Subject Access Requests.

Subject Access Requests should be made in writing to the address given below.

Fees

We will not charge a fee for this. However, we will charge a reasonable fee when a request is manifestly unfounded or excessive, particularly if it is repetitive.

We will also charge a reasonable fee to comply with requests for further copies of the same information.

The fee will be based on the administrative cost of providing the information.

Timescales

We aim to comply with requests for access to personal information as quickly as possible. In most cases we will be able to provide a copy of the information within one month of receipt of your written request. In order to do this we may ask you to provide additional details about the source, location and timeframe of the information you are requesting.

We may on occasions extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, we will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Manifestly unfounded or excessive requests

Where requests are manifestly unfounded or excessive, in particular because they are repetitive, we may:

- charge a reasonable fee taking into account the administrative costs of providing the information; or
- refuse to respond.

If we refuse to respond to a request, we will explain why and inform you of your right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

How will the information be provided?

We will verify the identity of the person making the request, using reasonable means.

Where the data is stored on the membership system you will be provided with direct access to your data via that system

Where the data is published on the BF website, you will be provided with the links to the website.

Requests for large amounts of personal data

If your request requires us to process a large quantity of information, we will ask you to specify the information the request relates to.

Rights and freedoms of others

The right to obtain a copy of information or to access personal data should not adversely affect the rights and freedoms of others. If by providing the information requested we would have to disclose information relating to or identifying a third party, we will only do so provided the third party gives consent, otherwise we may edit the data to remove the identity of the third party.

Unless we are under a legal obligation to release data, or the individual has given us permission, personal information will only be released to the individual to whom it relates. The disclosure of such information to anyone else without their consent may be a criminal offence.

Making a Subject Access Request

If you would like to make a Subject Access Request, please contact BF's Data Protection Officer:

Data Protection Officer

British Fencing Head Office

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1 Baron's Gate
33-35 Rothschild Road
London W4 5HT

You will also need to provide two forms of identification, for example, driving licence, utility bill or passport and, if appropriate, any particulars about the source, location and timeframe of the information you are requesting.

11. QUESTIONS ABOUT THE POLICY

If you have any questions about this Policy, please contact BF's Data Protection Officer:

Data Protection Officer
British Fencing Head Office
1 Baron's Gate
33-35 Rothschild Road
London W4 5HT

Or

dataprotection@britishfencing.com

12. APPENDIX A

12.1 BF EVENT PHOTOGRAPHY AND VIDEOS

BF accredited photographers may be present at BF sanctioned events, and in some cases events might be videoed and/or live streamed. BF will use photography and video to assist in the running of the competition and quality control (eg video refereeing, monitoring piste usage and field of play).

Images and videos may be used by BF and our subsidiary companies for the purposes of promotion, education and development of the sport. They may also be shared with relevant third party organisations' for journalistic/promotional purposes.

BF competition entry forms will advise participants that photography and filming will take place at the event. BF will also announce the photography/filming arrangements at the event. Those completing entry forms on behalf another person must ensure that the fencer/parent/guardian is informed of the arrangements. Clubs/schools must ensure that fencers/parents/carers attending the event from their clubs/schools are informed of the arrangements for the relevant event. Any fencer or parent/carer who does not wish themselves or their child/adult at risk to be photographed/filmed

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at the event must advise the event organiser. Although it is not always practical to manage the content of live steamed footage or remove video refereeing, BF will ensure any identifiable photographs of the participant are not published by BF. To help us do this we may ask you to avoid certain areas of the venue/field of play unless competing or officiating. We may also ask you to provide information to us which will allow us to identify you. We may also need to adjust your involvement in medal ceremonies.

BF is not responsible for personal footage (such as personal videos taken by parents), nor images taken by third parties, such as CCTV in venues.

*British Fencing, 1 Baron's Gate, 33 Rothschild Road, London W4 5HT
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