

## EXTERNAL FACING PRIVACY POLICY

### 1. Introduction

English Lacrosse Association Ltd, trading as 'England Lacrosse' a company limited by guarantee and registered in England and Wales under company number 3476816, and also known internationally as "Team England", is herein referred to as "English Lacrosse"/"England Lacrosse" /"we"/"us"/"our".

English Lacrosse is registered as a data controller with the Information Commissioner's Office, under registration Z8420804.

We are committed to protecting and respecting your privacy. Our policy and procedures on the handling of personal data have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation (in force from 25 May 2018) and applicable national law (including the UK GDPR adopted from January 2021).

### 2. What information do we collect?

We collect and process personal data, including special categories of personal data, about you when you interact with us through our website including licenses suites (Salesforce, CRM) or otherwise. The personal data we process may include:

- your name;
- your date of birth;
- your gender;
- your ethnicity;
- your home or work address, email address and/or phone number(s);
- health, medical, inclusion and disability information (including test results for anti-doping purposes);
- your image and other visual content relating to your physical appearance;
- your location and whereabouts (e.g., through the use of CCTV at our offices);
- details of your social media addresses/accounts and content;
- your identity documents (for example, a copy of your passport and driving licence);
- your next of kin and/or emergency contact information;
- your educational and employment history;
- any criminal convictions or related information (including any spent criminal convictions which, where applicable, will be confirmed to us by a certificate from the Disclosure and Barring Service ("DBS"));
- financial information, such as bank or card payment details;
- your England Lacrosse registration number and registered account information;
- name of any club(s) of which you are a member, including details of any educational establishment with which the club is affiliated;
- your role at the club of which you are a member;
- information relating to you and the British Universities & Colleges Sport ("BUCS");
- any results, records and rankings relating to you;
- information relating to any disciplinary matters in which you are involved;
- references and assessments about you from previous paid/unpaid employment or voluntary positions;

- information related to the browser, device and operating system you use to access our website;
- your Internet Protocol (IP) address;
- information relating to how you use our website;
- other information in the public domain about you;
- Biometric data including Clothing Sizes, biomechanical analysis results;
- any other information you provide, or which is provided to us on your behalf.

### **3. Where do we obtain this information?**

We obtain the information we process from:

- you directly (e.g., via online forms, telephone, email or otherwise);
- the club of which you are a member, and any educational establishment with which it is associated;
- any regional associations who are affiliated to us, but which have their own constitutions and organisational structures;
- our partner organisations, including national and international committees;
- anti-doping agencies including UK Anti-Doping ("UKAD") and the World Anti-Doping Agency ("WADA");
- those acting on your behalf;
- agents acting on our behalf;
- public domain sources;
- Online and off-line platforms we engage with (e.g. Eventbrite, SurveyMonkey, Typeform, Fundraising via National Squads);
- third parties providing fraud prevention, criminal record checking such as by the DBS;
- third parties that introduce you to us;
- HM Revenue & Customs, regulators, and other authorities, including law enforcement bodies; and,
- search engine and web analytics services providers.

### **4. How do we use this information and what is the legal basis for this use?**

We process the personal data listed in paragraph 2 above for the following purposes:

- To deliver our products and services, including to administer registration, our leagues, tournaments and competitions, as well as to enable participation in international events, and provide training/mentoring opportunities, in accordance with our legitimate interests and/or with your consent;
- to provide and administer international insurance coverage for affiliated members and individual members (to include public/product liability, professional indemnity, personal accident, and equipment coverage) in accordance with our legitimate interests and/or our legal obligations;
- for marketing and reporting purposes, including (i) England Lacrosse Weekly News Letter and Lacrosse the Board School mail-out (ii) to provide you with information about competitions and events, (iii) to promote our products and services, and (iv) to provide promotions and offers from our sponsors, where you have indicated preference to receive these communications and/or in accordance with our legitimate interests;

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- to determine your suitability for our services and positions connected to us (for example, registration, volunteering, coaching or officiating applications and assessments) in accordance with our legitimate interests;
- to enable us to comply with anti-doping rules, in accordance with our legitimate interests and/or our legal obligations;
- to enable us to act in accordance with our governance guidelines and association by-laws and constitutions;
- to enable us to investigate and determine disciplinary issues, in accordance with our legitimate interests;
- to verify your identity, in accordance with our legitimate interests and/or our legal obligations;
- to enable us to maintain our records and manage our relationship with you, in accordance with our legitimate interests and/or our legal obligations;
- to provide advice or guidance about our products and services, in accordance with our legitimate interests and/or our legal obligations;
- to establish, fulfil and manage a contract with between us and you, as necessary at your request prior to entering into a contract and/or in accordance with our legitimate interests (for example, assessing and processing of paid or unpaid job applications, registration forms and payments and processing payments for tickets to events/hospitality and/or relevant courses);
- to investigate any complaints received from you or from others, in accordance with our legitimate interests;
- for diversity monitoring, and talent management in accordance with our legitimate interests and/or our legal obligations;
- for funding purposes, in accordance with our legitimate interests;
- to enable us to comply with applicable law and regulation, in accordance with our legal obligations;
- to identify, assess and manage risk on an ongoing basis within our organisation, in accordance with our legitimate interests;
- to prevent, detect, investigate and report suspected or actual financial and other crime, in accordance with our legal obligations and our legitimate interests;
- to investigate and handle legal, compliance and regulatory issues, including litigation, in accordance with our legal obligations and our legitimate interests;
- to monitor the use of our website and to help us check, improve, and protect our content, services and websites, both online and offline, in accordance with our legitimate interests;
- to monitor the use of our office and to help us keep our office building, staff, and information safe and secure, in accordance with our legitimate interests;

- to invite you to take part in market research or surveys, where you have consented and/or in accordance with our legitimate interests; and,
- to assess and process any job/role application, and for subsequent employment, legal and administrative purposes including confirming your right to work, as necessary to take steps at your request prior to entering into a contract or to perform a contract (in which case we will be unable to progress your application without it), and/or in accordance with our legitimate interests.

## **5. With whom and where will we share your personal data?**

We may share your personal data with:

- Our staff and volunteers, including members of our Board, Sub-Groups, Committees Safeguarding officers, and individuals appointed to our Talent and Performance programme;
- Affiliated member organisations which include the club of which you are a member, schools, universities, and regional and county associations;
- National and/or international organisations including European Lacrosse Federation (ELF), World Lacrosse and World Games, in addition to national and international event hosts nations in which you are participating;
- anti-doping agencies including UK Anti-Doping ("UKAD") and the World Anti-Doping Agency ("WADA");
- our professional advisors, such as our auditors, external legal and financial advisors and insurers;
- our suppliers, business partners and sub-contractors;
- online service providers, such as Sport:80, How to Moodle and Typeform;
- search engine and web analytics services providers;
- HM Revenue & Customs, regulators, and other authorities, including law enforcement bodies, the DBS and Local Authorities (e.g., for funding purposes);
- credit reference and fraud prevention agencies;
- businesses, appointed to fulfill requirements and provide services for you, on our behalf, including Airlines, Hotels and Tour Operators;
- your advisors and/or other entities linked with you.

In the event that England Lacrosse or any part of it is sold or integrated with another business, your personal data will be disclosed to our advisors and those of any prospective purchaser and will be passed to the new owners of England Lacrosse and their advisors.

Our website may, from time to time, contain links to and from the websites of third parties such as our sponsors. If you follow a link to any of these third-party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these third-party privacy policies before you submit any personal information to such websites.

## 6. How long will you keep my personal data?

We will not keep your personal data for any purpose(s) for longer than is necessary and we will only retain the relevant personal information that is necessary in relation to the purpose for which it was collected.

We will retain information relating to recruitment for paid or unpaid positions for so long as it takes to process your application and, if it is unsuccessful, for an additional period of no greater than 6 months. If your application is successful, we will retain your personal data in accordance with our staff privacy policy.

We will retain information relating to the following activities as follows.

Type Of Personal Data	Storage Time Period
<p>Relating to Courses/Qualifications:</p> <ul style="list-style-type: none"> <li>i. Name and Date of Birth</li> <li>ii. Appointments associated with qualified status.</li> <li>iii. All other personal data relating to course enrollment and completion.</li> </ul>	<ul style="list-style-type: none"> <li>i. For so long as we have a legitimate interest to hold this data (such legitimate interest will usually take the form of ensuring verification of attendance/attainment).</li> <li>ii. 5 years from the date of the event/tournament activity was undertaken.</li> <li>iii. 3 years from the date of collection</li> </ul>
<p>Team and Squad Performance:</p> <ul style="list-style-type: none"> <li>i. Personal data of individuals in EL's representative squads (U19/U20's, U23 and Seniors)</li> <li>ii. Personal data of individuals in all lower age performance categories</li> <li>iii. Personal data relating to competitions.</li> </ul>	<ul style="list-style-type: none"> <li>i. 8 years from the date of last activity within the representative squad.</li> <li>ii. 3 years from the date of last activity within the performance category.</li> <li>iii. Indefinitely as such data is a matter of public record.</li> </ul>
<p>Events:</p> <ul style="list-style-type: none"> <li>i. Name, Position and Contact Information</li> <li>ii. School Name, Entering Team name or Institution Name, Results</li> </ul>	<ul style="list-style-type: none"> <li>i. 3 years from the date of collection</li> <li>ii. Indefinitely but without any identifying personal data included</li> </ul>
<p>Membership</p> <ul style="list-style-type: none"> <li>i. Name, Date of Birth, Address, Contact information.</li> <li>ii. All other information associated with the registration process including affiliate organisation and membership type.</li> </ul>	<ul style="list-style-type: none"> <li>i. 4 years from the date of expiry, after which only statistical data will be retained.</li> </ul>

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Otherwise, we will retain your personal data as long as we have an ongoing relationship and for a further period of 4 years thereafter, unless there is a legal or regulatory reason to retain it for a longer period in which case, we will delete it when it is no longer necessary for that purpose.

We will retain your data for a short time beyond the specified retention period, to allow for information to be reviewed and any deletion to take place.

### **7. Where is my data stored?**

All personal data collected by us will be stored via the means of Microsoft Office 365 Cloud Storage on a network accessible to England Lacrosse Staff and identified volunteers. In the event of a disruption to cloud services, data may be stored for a short period of time on local computer drives within the UK until they can be transferred to the Microsoft 365 system. Where required, we may transfer or share certain of your personal data to the facilities management company which operates our office.

In addition to local storage/transfer within the UK as above, data may also be transferred and stored elsewhere in the European Economic Area ("EEA") through our use of the Microsoft Office 365 suite of software hosting services (who operate across EEA nations).

Where identified volunteers are operating within roles on the England Lacrosse Board, Sub-Groups, Committees or appointed to our Talent and Performance programme and do not have access to Microsoft Office 365 Cloud Storage, personal data will be stored on local computer drives of these individuals.

Personal data may also be collected in a digital or physical format via staff or individuals, via the means of 'googledocs' and stored on the Google Drive platform. Google Drive hosts storage locations both inside and outside the EEA, England Lacrosse have taken the appropriate measures to ensure data storage within the EEA however Google may store and process the relevant Customer Data anywhere Google or its Sub processors maintains facilities.

Data which is collected and stored on Google Drive will be subject to regular transfer to Microsoft Office 365.

Data collected in physical means will be stored appropriately in respect of identified safeguards, and where possible transferred on a regular basis to be stored within EL Head Office premises.

The personal data that we collect from you may be transferred to and stored outside the EEA. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or for our partner organisations, including national and international committees and other organisations, for example, World Lacrosse. Where we do so, the third country's data protection laws will have been approved as adequate by the European Commission or other applicable safeguards are in place.

### **8. What are my rights in relation to my personal data?**

You have the right to ask us not to process your personal data for marketing purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your personal data, clicking the unsubscribe button on any communication we have sent to you or by contacting us.

Where you have consented to us using your personal data, you can withdraw that consent at any time by contacting us.

If the information we hold about you is inaccurate or incomplete, please notify us and ask us to correct or supplement it.

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You also have the right, with some exceptions, to ask us to provide a copy of any personal data we hold about you.

Where you have provided personal data to us and it is processed by automated means, you may be able to request that we provide it to you in a structured, machine-readable format.

If you have a complaint about how we have handled your personal data, you may be able to ask us to restrict how we use your personal data while your complaint is resolved.

In some circumstances you can ask us to erase your personal data if you withdraw your consent, it is no longer necessary for us to use your personal data, you object to the use of your personal data and we don't have a good reason to continue to use it, or we haven't handled your personal data in accordance with our obligations.

### **9. Personal data of children and vulnerable adults**

We are only entitled to collect and process personal data of individuals under the age of 13 and vulnerable adults with the authority of a parent or legal guardian. For data collection of individuals under the 13, mechanisms are in place to ensure that an authoritative body is doing so on their behalf.

For more information about how we meet our obligations in relation to vulnerable adults, including how we may share personal data in this context, when necessary, please refer to our Adults at Risk Policy and also our Code of Ethics and Behaviour Policy.

### **10. Where can I find more information about English Lacrosse's handling of my data?**

For further information or to raise a concern, please contact:

Name: Kerrie Worthington  
Postal address: England Lacrosse  
National Squash Centre  
Rowsley Street  
Manchester

M11 3FF

Telephone: +44 (0)161 974 7757

Email: [k.worthington@englandlacrosse.co.uk](mailto:k.worthington@englandlacrosse.co.uk)

If you are not happy with our response, you can contact the Information Commissioner's Office:

<https://ico.org.uk/>