

EXAMPLE: SPECIFIC RESEARCH PROJECT - PRIVACY NOTICE

Version 6.0 – December 2022

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1 INTRODUCTION

- 1.1 Podium Analytics (“Podium”, “we”, “our”, or “us”) is a charitable company registered in England and Wales with charity number 1183716 and Scotland SC051893, having its registered office at 6 Grosvenor Street, London W1K 4PZ. As a charity which exists to support the prevention of sports injuries, Podium has a vision to create a safer world of sport, ensuring more people can play sport for longer, and has a clear mission to significantly reduce the incidence and impact of injury in sport.
- 1.2 Podium requires valid, reliable and complete data on youth sports injury, illness, wellness and exposure in order to tackle the root cause of injury in youth sports.
- 1.3 Your privacy is extremely important to Podium, and we are fully committed to providing you with clear and transparent information about how we use your personal information. We value the trust you give us when sharing your personal information. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this privacy notice.

2 WHO DOES THIS PRIVACY NOTICE APPLY TO?

- 2.1 This privacy notice applies to individuals who participate in specific sports injury research project(s) (“you”) and your parents/guardians where applicable.
- 2.2 It tells you what you can expect when Podium collects personal information from you when you participate in a specific sports injury research project (“Research Project”) including how personal data will be processed, the third parties to whom it may be passed, the other data controllers with whom data is shared and how long Podium will retain the data. In addition, it explains your rights and responsibilities in respect of the data and how you can opt out of aspects of the processing, where applicable.
- 2.3 Podium is a data controller and is responsible for ensuring its processing of your data complies with applicable data protection legislation, including the Data Protection Act 2018 and the UK enactment of the EU General Data Protection Regulation 2016/679 implemented under section 3 of the European Union (Withdrawal) Act 2018 (the “UK GDPR”).

3 WHAT TYPE OF PERSONAL DATA IS COLLECTED, HOW IS IT USED AND WHAT IS THE LAWFUL BASIS?

- 3.1 We process data about you when you agree to participate in a Research Project.
- 3.2 The categories of personal information that we may collect, store and share includes:
 - Personal identifiers (such as name, date of birth, contact details and other identifiers collected as part of the Research Project)
 - Characteristics (such as gender, ethnicity, and language)
 - Medical information (such as doctor’s information, physical and mental health, injury diagnosis, medication, dietary information and disability)
 - Attendance information (such as sport sessions and matches attended)
 - Organisations (such as name of school or sports clubs attended)
 - Location (such as where sporting activity takes place)
 - Details of any devices you have used to interact with us (such as IP address and cookies)
 - Audio and visual media (including audio, images and videos)

3.3 Podium will use this data to:

Activity	(i) Lawful Basis; and (ii) Condition for Processing (where relevant)
Analyse sports injuries, treatment, rehabilitation and recovery.	(i) Legitimate Interest (ii) Archiving, scientific or historical research purposes or statistical purposes in the public interest
Conduct research on sports injuries and treatment programmes in children and young adults	(i) Legitimate Interest (ii) Archiving, scientific or historical research purposes or statistical purposes in the public interest
Develop sports related products, treatments, therapies and rehabilitation and training programmes	(i) Legitimate Interest (ii) Archiving, scientific or historical research purposes or statistical purposes in the public interest
Conduct research reviews and publish the outcomes of research where useful	(i) Legitimate Interest (ii) Archiving, scientific or historical research purposes or statistical purposes in the public interest
Share any personal data with a relevant governing or representative body for sport and P.E, research institute or other organisations	(i) Consent (ii) Explicit Consent

- 3.4 Where we ask for your consent to take part in a Research Project, this is part of the process to ensure that we conduct our projects in an ethical and informed way. Consent obtained to participate in a Research Project is different to the consent obtained to process any Personal Data. This will be explained within any information sheets provided during the Research Project.

4 HOW IS THE DATA COLLECTED?

- 4.1 Podium collects personal data when you agree to participate in a Research Project and throughout the duration of your interaction with that Research Project.
- 4.2 The data may be provided to us by your school and/or your sports clubs, as well as directly from you and your parents/guardians. Information may also be collected through other technologies such as wearable devices, video cameras and other equipment and third-party apps. Where artificial intelligence is used to process data, this will be solely for the purposes set out in this privacy notice and not for automated decision making or profiling about you.

5 HOW IS THE DATA STORED?

- 5.1 Podium maintains a high standard of security of its data collection platform and associated technologies and takes all reasonable measures to hold any personal data securely. We have implemented robust physical controls and electronic safeguards, and have in place internal policies and controls, to prevent unauthorised disclosure or access to your information and to ensure that your data is not lost, accidentally destroyed or misused.
- 5.2 Podium operates a 'privacy by design' approach. This means that privacy and the protection of individuals' data is considered from the initial design, and through all areas of development, of Podium's data collection platform to ensure the highest standards of privacy and security.
- 5.3 Your data will be stored within the United Kingdom or the European Economic Area. We do not transfer personal data outside of the United Kingdom or the European Economic Area other than, potentially, to a few of our service providers in other parts of the world in accordance with transfer and processing agreements. Wherever we need to transfer your personal data outside of the United Kingdom, we will

take proper steps to require that those third-parties protect your data in accordance with this privacy notice and applicable data protection legislation.

6 HOW LONG IS THE DATA STORED FOR?

- 6.1 We will only retain your personal data in relation to a Research Project while you remain actively engaged in that Research Project, or if you give us your consent to hold it for another purpose. Personal data will be deleted, or anonymised so that it is no longer personally identifiable data, 3 years following the last activity in relation to the Research Project.
- 6.2 Personal data may be retained for longer if required in accordance with any statutory or professional retention periods applicable to Podium.

7 SHARING YOUR PERSONAL DATA

- 7.1 We do not share personal information about you to any third party without your consent, unless the law and our policies allow us to do so. Where you have provided your consent, we may share your personal information with such third parties as:
 - Your school and/or sports clubs you are a member of which participate in our Research Projects;
 - Our research partners, including the Podium Analytics Institute for Youth Sports Medicine and Technology;
 - Governing and representative bodies of sport and recreation
- 7.2 We may, occasionally, appoint other organisations to carry out some of the data processing activities on our behalf. These may include technology hosts and other service providers. In these circumstances, we will ensure that personal data is properly protected and that it is only used in accordance with this privacy notice.
- 7.3 Where personal data has been anonymised such that it no longer contains any personal data (the “Anonymised Data”), Podium may use and share the Anonymised Data for any purpose. The Anonymised Data may be retained by Podium for an indefinite period.
- 7.4 Podium will never sell any personal information to third parties.

8 YOUR RIGHTS

- 8.1 You have a number of legal rights in respect of your data. Given the nature of the personal data that is collected, stored, analysed and shared as described in this privacy notice, we have determined that a parent/guardian can exercise these rights on your behalf. Even if your parent/guardian has given consent to the collection, storage, analysis and sharing of your personal data, you can also exercise these rights when you reach your 13th birthday if you are competent to do so as far as the law is concerned. Your rights include:
- 8.2 **Right to be informed about how your information is processed:** We hope the information in this privacy notice has informed you as to how we process your personal data but please contact us if there is any additional information you require (see ‘How to contact us’ below).
- 8.3 **Right to access any personal data held about you:** You have the right to see the personal information we hold about you. This is called a Data Subject Access Request. You can request a copy of any personal information that we hold about you by contacting us in writing (see ‘How to contact us’ below). The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. Under the UK GDPR, Podium is required to respond to your request within one month.
- 8.4 **Right to withdraw consent:** Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This does not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please

contact us (see 'How to contact us' below).

- 8.5 **Right to have your data rectified if it is inaccurate:** If we do hold information about you, you can ask us to correct or amend any inaccurate or incomplete information by contacting us in writing at the address below. We will either make the requested amendments or provide an explanation as to why we are not making the changes.
- 8.6 **Right to have your data erased (except if there is a valid lawful reason to retain it):** You have the right to request the deletion of your information in advance of our standard retention periods. We will delete or anonymise this information such that it is no longer personally identifiable information unless there is a lawful reason for the information to be retained.
- 8.7 **Right to have your information restricted or blocked from processing:** If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.
- 8.8 **Right of portability of your personal data:** Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to another organisation.
- 8.9 **Right to object to the processing of your personal data:** You have the right to object to our processing of your personal data in certain circumstances depending on the purpose of processing the data and on the lawful basis for processing.
- 8.10 **Right to complain:** See section 11 below.
- 8.11 Please note, these rights may be limited, for example if fulfilling your request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights) or if you ask us to delete information which we are required by law to keep. Relevant exemptions are included in both the UK GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely on when responding to any request you make.

9 HOW TO CONTACT US

- 9.1 For further information, you can contact us by:

Write to us: Data Protection Officer, Podium Analytics, 6 Grosvenor Street, London W1K 4PZ

Call us: +44 (0)20 3862 7283

Email us: dataprotection@podiumanalytics.org

Podium Analytics is registered as a Data Controller with the Information Commissioner's Office – registration number: ZA703878.

10 COMPLAINTS

- 10.1 If you have any concerns or complaints about how we are handling your personal data, we would prefer you to get in touch with us directly so that we can try to resolve the issue (see 'How to contact us' below).
- 10.2 You can also contact the Information Commissioner's Office if you are unhappy with how we have used your data at www.ico.org.uk or at the following address:

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113