

SPORTSMART PROGRAMMES – USER PRIVACY NOTICE

Version 2.0 – March 2023

An orange line graphic that starts at the bottom left, rises to a peak, falls to a trough, rises to a higher peak, and then falls to a trough again, ending at the bottom right.

**FOR A SAFER
WORLD OF SPORT**

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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, having its registered office at 6 Grosvenor Street, London W1K 4PZ.
- 1.2 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. To do this, it provides:
 - 1.2.1 ‘SmartSport’ a digital platform to collate and track injury information for schools and clubs; and
 - 1.2.2 ‘Resource Hub’, a digital platform to access content and educational materials about sports injury.They are referred to in this privacy notice as the ‘SportSmart Programmes’.
- 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 tells you what you can expect when you sign up to and use SportSmart Programmes as a user within a sports club or school. This includes information on how your personal data will be processed, the third parties to whom it may be passed, the other data controllers with whom data may be 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.
- 2.2 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 TYPES AND USES PERSONAL DATA

- 3.1 We process data about you when you sign up to and use SportSmart Programmes. The types of personal data that we collect are set out below:
 - Personal Identifiers (such as name, date of birth, contact details and other identifiers collected through the SportSmart Programmes)
 - Employment Information (such as name of school or sports club you work for, position and professional qualifications)
 - Details of any devices you have used to interact with us (such as IP addresses and cookies)
 - Audio and visual media (including audio, images and videos)
 - User information (such as logins and activity within SportSmart Programmes).
- 3.2 Podium will use this information in the following ways:

- To process your registration to use the SportSmart Programmes and provide you with a username and password
- Ensure the security of your account
- Enable you to download and share your injury reports
- Maintain correct and up to date information about you
- Notify you about changes to our services
- Measure and analyse the use of our SportSmart Programmes to improve our services
- Handle your choice of settings within our SportSmart Programmes
- Process and deal with complaints or enquiries or feedback made by you
- Conduct research on sports injuries and treatment programmes in children and young adults
- Provide sports and other relevant governing bodies with details of officials who provide data under their protocols (if applicable)
- Send you information about SportSmart Programmes and Podium
- Tailor the content that you see on the Resource Hub

4 WHAT IS THE LAWFUL BASIS FOR USING THIS DATA?

- 4.1 Every instance of processing personal data under the UK GDPR requires a 'lawful basis'.
- 4.2 The lawful basis of processing personal data described in this privacy notice is:

Legitimate Interests – the processing is necessary for the purposes of our, the schools' and the clubs' legitimate interests in delivering SportSmart Programmes and to help us improve our services.

Consent – where we wish to send marketing about Podium's activities (not service information about SportSmart Programmes) we will ask you for your consent. Your consent can be withdrawn anytime by contacting us.

Contract – when registering an account with Podium for use of a SportSmart Programme, Podium will enter into a terms of use with you and are required to process data in accordance with that contract.

5 HOW IS THE DATA COLLECTED?

- 5.1 Podium collects your personal data:

- when you register to use SportSmart Programmes;
- whenever you use SportSmart Programmes;
- whenever you or a third party provide your data on SportSmart Programmes;
- whenever you provide your data to us when reporting a problem, making a complaint, making an enquiry or contacting us for any other reason; and

- whenever you disclose your data to us, or we collect your data from you, in any other way through our SportSmart Programmes.

6 HOW IS THE DATA STORED?

- 6.1 Podium maintains a high standard of security of SportSmart Programmes 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.
- 6.2 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 SportSmart Programmes to ensure the highest standards of privacy and security.
- 6.3 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.

7 HOW LONG IS THE DATA STORED FOR?

- 7.1 We will only retain your personal data while you remain actively engaged in our Programmes, 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 your last activity in the SportSmart Programmes.
- 7.2 Personal data may be retained for longer if required in accordance with any statutory or professional retention periods applicable to the school and/or sports club you have registered on behalf of, or Podium.

8 SHARING YOUR PERSONAL DATA

- 8.1 We may share your personal information with such third parties as the school or club which you are registering to use, and using, SportSmart Programmes on behalf of.
- 8.2 We will not share personal information about you to any other third party without your consent unless the law and our policies allow us to do so.
- 8.3 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.
- 8.4 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.
- 8.5 Podium will never sell any personal information to third parties.

9 YOUR RIGHTS

- 9.1 You have a number of legal rights in respect of your data. Your rights include:
- 9.2 **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).

- 9.3 **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.
- 9.4 **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).
- 9.5 **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.
- 9.6 **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.
- 9.7 **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.
- 9.8 **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.
- 9.9 **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.
- 9.10 **Right to complain:** See section 11 below.
- 9.11 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.

10 HOW TO CONTACT US

- 10.1 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.

11 COMPLAINTS

- 11.1 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).

- 11.2 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