

SPORTSMART – PUPIL AND PLAYER PRIVACY NOTICE

Version 2.0 - March 2023



**FOR A SAFER
WORLD OF SPORT**

TABLE OF CONTENTS

TABLE OF CONTENTS	2
1 INTRODUCTION	3
2 WHO DOES THIS PRIVACY NOTICE APPLY TO?	3
3 WHAT PERSONAL DATA IS COLLECTED, HOW IS IT USED AND WHAT IS THE LAWFUL BASIS?	3
4 HOW IS THE DATA COLLECTED?	4
5 HOW IS THE DATA STORED?	4
6 HOW LONG IS THE DATA STORED FOR?	5
7 SHARING YOUR PERSONAL DATA	5
8 YOUR RIGHTS	5
9 HOW TO CONTACT US	6
10 COMPLAINTS	6

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 with number SC051893, having its registered office at 6 Grosvenor Street, London W1K 4PZ. As a non-governmental organisation 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 aims to achieve this mission by providing SportSmart for use as a service by schools and sports clubs to use to track and record incidence of an injury. Podium will use the information captured in SportSmart as part of statistical research projects.
- 1.3 Podium provides SportSmart to schools and sports clubs as a ‘Data Processor’. However, it also uses the data as a ‘Data Controller’, and the use of this data is detailed below.
- 1.4 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 whose information is collected within SportSmart (“you”) and your parents/guardians where applicable. It also applies to your use of our SportSmart through which we collect and process your personal information.
- 2.2 It tells you what you can expect when Podium collects personal information from you when your school or sports club uses SportSmart, including how personal data will be used by us, 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 Your school or club is a data controller for the purposes that it uses SportSmart and we would encourage you to contact your club and / school for further information on how they process your personal data.
- 2.4 Regarding Podium’s use of your data for the activities set out below, Podium acts as 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 PERSONAL DATA IS COLLECTED, HOW IS IT USED AND WHAT IS THE LAWFUL BASIS?

- 3.1 Podium collects the following information from your school or club when it is entered on the SportSmart platform:
 - Personal identifiers (name, date of birth, contact details and other identifiers collected through SportSmart)
 - Characteristics (such as gender and ethnicity)
 - Medical Information (physical and mental health, injury diagnosis)
 - Attendance information (such as sport/P.E session or matches attended)

- Organisation (such as name of school or sports club)
- Email address
- Details of any consents you have given
- Supporting information relevant to our services provided to your schools/club or directly to you

3.2 Podium will use this data to:

Activity	(i) Lawful Basis; and (ii) Condition for Processing (where relevant)
Anonymisation and aggregation for use in research and statistical analysis relevant to Podium’s mission.	(i) Legitimate Interest (ii) Archiving, scientific or historical research purposes or statistical purposes in the public interest
Analyse the use of SportSmart and improve the delivery and impact of our services and programmes.	(i) Legitimate Interest
Send you communications about Podium’s work, any specific research projects and other relevant information	(i) Consent
Player matching – where we can match activities and share your injury records between your organisations (such as between your club, school and / or academy)	(i) Consent (ii) Explicit Consent
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

4 HOW IS THE DATA COLLECTED?

- 4.1 Podium collects personal data when it is provided to us by your school and / or club via SportSmart.
- 4.2 Podium may invite individuals to take part in Specific Research Projects. Where this happens you will be provided further information and a separate privacy notice will apply. An example is viewable on Podium’s Privacy Centre.
- 4.3 Podium may collect personal data where you have created a player or parent profile on the SportSmart application and enter information yourself. A separate privacy notice applies to this and is viewable on Podium’s Privacy Centre.

5 HOW IS THE DATA STORED?

- 5.1 Podium maintains a high standard of security of its data collection SportSmart 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 SportSmart 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 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 the last activity in the Podium SportSmart with respect to the individual.
- 6.2 Personal data may be retained for longer if required in accordance with any statutory or professional retention periods applicable to the School or Podium.
- 6.3 When we anonymise personal data 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 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 Programmes for the purposes of notifying them about any injuries that have occurred;
 - Governing and representative bodies of sport and recreation;
 - Third party research organisations, including the Podium Analytics Institute for Youth Sport Medicine and Technology
- 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 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