

# PRIVACY NOTICE

## Guernsey En Garde

Under Guernsey's data protection law, individuals have a right to be informed about how organisations use their personal data.

This privacy notice explains how we, Guernsey En Garde (the **Club**) collect, store and use personal data about our members and people connected with the Club (including parents, legal guardians, carers of the members and/or prospective members, coaches, volunteers and our employees). All references to “you” and “your” in this Privacy Notice shall where the context so admits include the members/prospective members; parents, legal guardians and carers of the members and/or prospective members; coaches; volunteers and employees of the Club.

The Club is an unincorporated charity (registered with Guernsey registration number CH633).

For the purposes of the Data Protection (Bailiwick of Guernsey) Law, 2017 (as amended) (the **Guernsey DP Law**), the Management Committee of Guernsey En Garde is the data ‘controller’. This means that the persons comprising the Club's Management Committee are responsible for determining the means of processing your personal data (as more fully described below) and responsible for ensuring continued compliance with the Guernsey DP Law.

The purpose of the Club is to further fencing in Guernsey (the **Primary Purpose**)

## The personal data we hold

Personal data that we may collect, use, store and share (where appropriate) includes, but is not restricted to the following categories:

- **Identification information\*** of:
  - the prospective member/ member: such as name, gender, date of birth and (where relevant) British Fencing Membership Number and records and any other relevant fencing body's registration and membership number and records; and
  - the parents/legal guardians or carers of the prospective member/ member
- **Contact Details\*** of the prospective member/member and (if applicable) his or her parents, legal guardians or carers including: email address, contact addresses and telephone numbers, contact preferences and where a member attends an event emergency contact details, details and copies of passports and visas
- Financial **information** in order to process the membership fee

- Special characteristics of the member such as confirmation of whether the member has any special educational needs
- Details of any **underlying medical conditions**\* including health data (including, where relevant, vaccinations) concerning the member's physical and mental health including details of any injuries, allergies, medication and any other information relating to fitness and health
- **Attendance** information (including dates) and sign in sheets for training and events
- **Safeguarding** information in line with British Fencing, Guernsey Union d'Esclime and the Guernsey Sports Commissions' recommendations and the safeguarding policies of the Club
- **Photographs and photographic images**\* captured during the course of fencing or Club activities
- **Information you provide to us**\* during the course of communications with us and any additional personal information in the course of our relationship with you.

In the case of our coaches/employees who are employed by us, in addition to the information referenced by way of an asterisk (\*), we may also process the following information:

- Background checks (including information about criminal convictions and offences)
- Recruitment information (including right to work documentation, CVs, qualifications and references)
- Salary and contract of employment
- Bank account details, payroll records and tax status information,
- Social security number,
- Start date, where relevant leaving date (and reason for leaving),
- Performance information and information relating to any complaints or grievances (if applicable)
- Any additional personal information provided to us in the course of the job-related and Club activities throughout the period of you working for us.

## Why we use your personal data and on what basis?

The Guernsey DP Law requires us to be able to explain why we process your personal data and identify a legal basis to justify our processing.

We only collect and use your personal data when the law allows us to. Most commonly, we process it:

- Where we need to process the personal data in order to comply with a legal obligation imposed on us by an enactment ("**Legal Obligation**")
- We need to process the personal data for the purpose of our legitimate interests in connection with the Primary Purpose ("**Legitimate Interest**")

We may also process your personal data in situations where:

- We have obtained consent to use it a certain way ("**Consent**")
- We need to protect your vital interests (or someone else's interests) ("**Vital Interests**"). In practice, this basis is very limited in its scope and generally only applies to matters of life and death.

Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. This is made clear in the Guernsey En Garde membership form which also explains how consent may be withdrawn.

The following table summarises the types of personal data we process and the rationale for processing the data:

Type of Personal Data used	Reason for processing	Legal Basis	Duration of processing
Parent/legal guardian/carer contact details (name, email and postal addresses and telephone numbers)  Member full name, DOB and British Fencing Number	Completion of membership and activity related administration including for example, assisting with any membership enquiries (including answering questions to prospective members)	Legitimate Interests	The duration of the individual's membership and for a maximum of two years after the membership has ceased.

<p>Parent/legal guardian/carer contact details (name, email and postal addresses and telephone numbers)</p> <p>Member full name, DOB and British Fencing Number</p>	<p>Enable us to communicate relevant information about fencing and Club activities with our members and/or their parents, legal guardians and carers including upcoming fencing events, competitions, training dates and trips.</p>	<p>Legitimate Interests</p>	<p>The duration of the child's membership and for a maximum of two years after the membership has ceased.</p>
<p>Parent /legal guardian/carer contact details (name, email and postal addresses and telephone numbers)</p>	<p>Enable us to contact parents, legal guardians and/or carers in the event of an emergency</p>	<p>Vital Interests</p>	<p>The duration of the individual's membership and for a maximum of two years after the membership has ceased.</p>
<p>Attendance and attainment Information</p>	<p>Enable us to monitor attendance at fencing and Club activities including competition participation and results</p>	<p>Legitimate Interests</p>	<p>The duration of the individual's membership and for a maximum of two years after the membership has ceased.</p>
<p>Member medical or health related information including special educational needs</p>	<p>Protect member welfare including safeguarding members' interests and to ensure we comply with any health and safety requirements. Includes ensuring that appropriate level of care is</p>	<p>Legal Obligation</p> <p>In limited circumstances we may need to process data for the vital interests of the member.</p>	<p>The duration of the child's membership and for a maximum of 7 years after the membership has ceased.</p>

	given to all members whilst they attend fencing activities		
Photographs and video images	Marketing and Communications of the Club's activities	Consent	For as long as the Club has permission to process the images – i.e. until the member or, where the member is a minor, the member's parent/legal guardian or carer withdraws consent.

## Photography and Marketing

The Club may, from time to time, take and engage accredited photographers to take photographs and videos at Club events and activities. These images may be used by the Club for the purpose of promotion, education and as part of the Primary Purpose (i.e. the furtherance of the sport on the island). They may also be shared with media and social media e.g. the Guernsey Press. We will not, however, seek to publish these photographs without your consent (which may be withheld or withdrawn at any time).

Any parent, legal guardian, carer or member who does not wish to be filmed or to have their photograph taken should ensure that they advise us as soon as possible in writing by emailing us at: [secretary@guernseyengarde.com](mailto:secretary@guernseyengarde.com)

Filming and photography may also take place at sporting competitions and events which members have entered. The Club will not be a data controller in these circumstances, and whilst it will endeavour to advise members and parents, legal guardians and carers of the photography arrangements prior to attendance at such events any member/parent, legal guardian or carer who does not wish themselves or their child to be photographed or filmed at such event must advise the event organiser.

The Club will communicate with you predominantly through email, notices and social media. Our communications will provide you with information including details about training sessions, dates for the diary, upcoming trips and events, information regarding holidays and payment instructions. If you do not wish to receive these communications from us anymore please contact us at: [secretary@guernseyengarde.com](mailto:secretary@guernseyengarde.com)

## How we store this data

We keep personal information about members whilst they are members of the Club. We may also keep it beyond their membership if necessary in order to comply with our

legal obligations and in line with British Fencing national and Guernsey Union d'Escrime local guidelines.

All data relating to current members and employees is stored in password-protected files with access limited to members of the Management Committee only.

Data relating to individuals who are no longer members is stored in password-protected files accessible only to members of the Management Committee.

## Data sharing

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information of members with:

- British Fencing Association Ltd (company number 1917099) and associated organisations
- Guernsey Union d'Escrime LBG
- Guernsey Sports Commission
- Guernsey Education Department
- Health and social welfare organisations
- Police forces, courts and tribunals
- Coacha
- where relevant, Elizabeth College, Ladies College and other Guernsey schools.

## Transferring data internationally

Where we transfer personal data to a country or territory outside the EEA, we will do so in accordance with the data protection regime and in particular the Guernsey DP Law.

## Your rights regarding personal data

You have a right to make a 'subject access request' to gain access to personal information that the Club holds about you. Parents/Legal Guardians and Carers can on behalf of the child, make a request for their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you or your child (if applicable), we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Give you a copy of the information in an intelligible form

You also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances (known as 'data portability').

## Other rights

Under Guernsey DP Law, you have certain rights regarding how your personal data is used and kept safe, including:

- Right to object to the processing of personal data for direct marketing purposes or on the grounds of public interest
- In certain circumstances, the right of restriction of processing
- Right to object to decisions being taken by automated means (by a computer or machine rather than by a person)
- In certain circumstances, the right to have inaccurate personal data corrected, deleted or destroyed or restrict processing

To exercise any of these rights, please contact the Club using the details described under the heading 'Contact Us' below.

## Complaints

If you have any concern about our data processing, please first contact [secretary@guernseyengarde.com](mailto:secretary@guernseyengarde.com)

Alternatively, you can make a complaint to the Office of the Data Protection Authority, St Martin's House, Le Bordage, St Peter Port, Guernsey, GY1 1BR. Telephone 01481 742074 or visit their website at: [www.odpa.gg](http://www.odpa.gg)

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact [secretary@guernseyengarde.com](mailto:secretary@guernseyengarde.com)