

Uxbridge Martial Arts Academy (UMAA)

DATA PROTECTION PRIVACY NOTICE

Introduction

UMAA is committed to process any personal information it holds only in ways that are fair, transparently and meet its legal obligations, in other words, in accordance with the Data Protection Act and its successor the General Data Protection Regulations (GDPR).

UMAA will take care over email addresses which in addition to the GDPR are subject to the Privacy and Electronic Communication Regulations (PECR).

Data protection principles

The legislation sets out various data protection principles. These include that personal information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- kept safe and secure
- not transferred outside the European Economic Area without adequate protection

Information within NAKMAS processes

Legal basis for processing

The legislation requires that there is a clear legal basis for processing personal information. In general, UMAA relies on the individual's consent to process their data. Where there are exceptions such as a legal obligation, contractual agreement, UMAA's legitimate interest, they will be noted.

Please note that if consent is withdrawn the level of service that we can offer might be severely curtailed.

PURPOSE	PERSONAL INFORMATION USED	LAWFUL BASIS	RETENTION
To administer a membership affiliation you have with us and managing our relationship with you (including arranging any insurance) and dealing with payments and any support, service or product enquiries made.	Contact and membership details – club/organisation affiliation, forms received, transaction and payment information, and marketing preferences	Necessary to enable us to properly manage and administer your membership contract with us.	6 years following end of membership contract
To administer the enquiry and forward to you the required information.	Contact details – enquiring members	Necessary to enable us to send to you the required information to consider membership.	Up to 12 months (in daily diary of enquiries)
To administer membership and arrange for a licence and insurance to be issued.	Individual contact and membership details – students	Necessary to enable us to properly arrange membership and insurance.	6 years following end of membership contract
To administer membership and manage our relationship with named liaisons between us and clubs/organisations.	Individual contact and membership details – instructors/welfare officers	Necessary to enable us to properly manage and administer your membership contract with us, including insurance.	6 years following end of membership contract
To arrange and manage any contracts for the provision of any services.	All contract and membership details	Necessary to enable us to properly administer and perform any contract for the provision of services.	6 years following end of membership contract
To send information which is included in membership benefits including insurance.	All contract and membership details	Necessary to enable us to properly manage and administer your membership contract with us.	6 years following end of membership contract
To send you other marketing information we think you	All contract and membership details	Necessary to enable us to	6 years following

might find useful or which you have requested from us: including newsletters, information about membership and services and events.		provide you with services which are considered further development. Where you have given us your explicit consent to do so via GDPR003.	end of membership contract, unless withdrawal of consent is received
To answer your queries or complaints.	Contact details and records of your interactions with us.	We have a legitimate interest to provide answers to your questions and any complaints.	6 years following end of membership contract
To prove attendance/completion of training modules	Copies of certificates for training modules	Necessary for legitimate interest in maintaining a full record for membership.	6 years following end of membership contract
To maintain performance requirements and administer membership and insurance provision.	Information about health and medical conditions	Necessary to enable us to properly manage and administer membership benefits. Consent is gained for this information to be kept via individual licence application forms.	6 years following end of membership contract
To enable the processing of insurance claims.	Personal details and health and medical conditions. Accident records	Necessary to enable us to process insurance claims, either immediately or in the future.	6 years following end of membership contract Indefinitely
To identify and review potential threats to risk assessment and for the protection of members.	Accident records	Necessary for any potential claims either during or following membership.	Indefinitely
For the purposes of equal opportunity monitoring	Information regarding special category personal	Necessary in pursuit of Equality Standard in Sport,	Until the data is analysed

	data, ie, race, ethnicity, disability etc (is anonymous)	and for equality of recruitment of staff, management and members.	
To gather evidence for possible grievance or disciplinary hearings.	Personal information collected including any disciplinary and grievance information.	Necessary for legitimate interest, to provide safety and fairness for all members, and to ensure the effective management of any disciplinary hearings, appeals and adjudications.	6 years following end of membership contract
To maintain employee records, and arrange for PAYE, pension payments, and wages.	Personal information collected, hours worked, signed contracts, training undertaken.	Necessary for legitimate interest and the purpose of paying employees correctly for the hours worked.	6 years following end of employment contract
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements. Information may be shared with other individuals or organisations where the welfare of a child could be at risk.	Information about your criminal convictions and offences.	For criminal records history we process it based on legal obligations or based on your explicit consent.	Indefinitely in case of a future welfare case
To maintain records in the event of a further incident, which may result in an investigation or claim. For example, court proceedings, police or social services investigation...	Incident report records	Necessary for legitimate interests and the protection of individual members.	6 years following end of membership contract
E-news – items of interest for members	Email addresses	Explicit consent given.	During membership contract, unless withdrawal of consent is received

Black Belt Register	Names and Grades	Necessary to prove grades given by us while in membership.	Indefinitely
Previous Member Record	Book with club code, name of club and reason for end of contract	Necessary for legitimate interests; returning members, and for any legal enquiries	Indefinitely
To maintain spreadsheet for clubs/organisations, with details such as contract expiry and contact details	Membership Spreadsheet	Necessary for public enquiries and to monitor membership levels and renewals, as well as legitimate interests	Indefinitely
To maintain spreadsheet for instructor and welfare officer details to ensure compliance	Instructor/Welfare Officer Spreadsheet	Necessary for legitimate interest	6 years following end of membership contract
To verify applicant's identification to process a disclosure application	Copies or originals of identification documents.	Necessary for DBS/Disclosure Scotland requirements	Copies destroyed when certificate is received. Original id is returned immediately it has been seen
To confirm status and right to work, to process a disclosure application	Signed forms to confirm these details	Necessary for DBS/Disclosure Scotland requirements	6 years following end of membership contract
To confirm applicant's knowledge of DBS privacy policy	Signed form to confirm this	Necessary for DBS requirements	3 months after application signed
To keep a record of clubs/organisations holding membership and insurance	Table with club names, codes and expiry dates – master list and monthly lists for returns to insurer	Necessary to enable us to properly arrange membership and insurance.	Updated in 12 month cycles

To manage addresses so that orders and insurance documents can be sent out correctly	Address labels	Necessary to enable us to properly manage and administer your membership contract with us.	During membership period only
To keep records in the event of a continuance claim	Claims settled information	We have a legitimate interest in keeping these records	Indefinitely

Data Retention

At the end of a membership contract, the file with all personal information, applications forms, transactions and interactions, will be archived for a period of six years. After that time, the file is destroyed by fire.

UMAA relies on legitimate interest as the legal basis for retaining information including future claims and enquiries.

Forms

There are various forms on the website used to collect information. That information is only used for the stated purposes which are described in the relevant sections of this Privacy Notice.

Payments

PayPal is used to take payments. Only sufficient information to complete the payment is shared with PayPal. Credit/debit card payments made by post or by telephone are kept only long enough to take the payment. A copy of the receipt is sent to the person paying and the copy is attached to the bank statement for the Accountant to write up the accounts. Credit/debit card details are not kept but shredded immediately payment has gone through.

Links to other websites

This Privacy Notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Suppliers and Third Parties

Use of data processors

Data processors are third parties who provide services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for

the period we instruct. The following is a list of our main data processors. There may be others from time to time.

Posting

When sending letters, parcels, publications and purchases we will share your postal address with the delivery service (Normally Royal Mail or APC).

When receiving letters or orders, anything with personal details on which is not filed in the club file, is shredded immediately.

DBS / Disclosure Scotland

The application forms sent to us by members are processed and sent on to either DBS or Disclosure Scotland for processing. We keep only the accompanying forms which are filed in the club file (as table above). Copies of ID are kept only until the Disclosure certificate is received from the applicant (DBS) or Disclosure Scotland. At this time, copies of id are shredded immediately.

Accountant

Our bookkeeper/accountant acts as a trusted third party to process our accounts, and handles the PAYE/staff wages including payments to NEST for pension schemes.

Insurer

XL Catlin acts as a trusted third party to provide insurance as part of our membership benefits, and to process any claims. They are sent information in accordance with the Financial Conduct Authority requirements. All information is treated as confidential.

International Data Transfers

Your personal information will be stored in the EU and in accordance with the GDPR.

The GDPR applies to EU residents. If we share personal information of EU residents with suppliers or 3rd parties outside of the EU we will ensure that they meet the requirements of the GDPR.

We are committed to complying with the data regulations of non-EU residents according to their jurisdiction.

Security

UMAA has implemented technical and organisational security measures to protect your personal data against unauthorized access, loss or misuse. Cabinets where physical data is stored are locked and keys are kept off site out of office hours. Computers are password

protected and we have a trusted third party IT consultant to ensure competence of our limited IT data.

Your rights in relation to personal information

The legislation conveys various individual rights. These include the following:

- The right to be informed about how your personal information is being used;
- The right of access to personal information we hold about you;
- The right to request the correction of inaccurate personal information we hold about you;
- The right to request the erasure of your personal information in certain limited circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data either to you or another service provider
- The right to object to certain automated decision making and profiling processes using personal information.

You can read more about your rights at <https://ico.org.uk/for-the-public/>

Complaints or Queries

UMAA tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind.

Confidentiality will be preserved during the investigation of a complaint to safeguard the interests of everyone concerned unless disclosure is necessary to progress the complaint.

If you want to make a complaint about the way we have processed your personal information, please contact us in writing to the address provided at the end of this Notice.

Access to personal information

UMAA tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by asking. This is formally known as a 'subject access request' under the Data Protection Act 1998. If we do hold information about you we will:

- give you a description of it.
- tell you why we are holding it.
- tell you who it could be disclosed to.
- let you have a copy of the information in an intelligible form.

To make a request to NAKMAS for any personal information we may hold you need to put the request in writing to the address provided below.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes.

We may make an administration charge of up to £10 for a request.

Disclosure of personal information

Except as described in this Privacy Notice we will not disclose personal data without consent.

Legal Obligation

We may disclose your information to governmental agencies or entities, regulatory authorities, or other persons in line with any applicable law, regulations, court order or official request.

Malpractice / Maladministration

An investigation into malpractice may result in personal information being shared with the regulatory authorities, other legal body, examiner, instructor, student or third party that notified us of the suspected or actual malpractice. In this case UMAA will rely on consent and/or legal and/or legitimate interest as the legal basis for holding and sharing this information.

How to contact us

Please send any data protection enquiries to: shabaaz@umaa.club