## **NPL Hockey Club VEO Privacy Policy**

NPL Hockey Club Privacy Policy

#### 1. Introduction

NPL Hockey Club ("we", "us", "our" or "the Club") is committed to protecting and respecting the privacy of our members and visitors. This Privacy Policy outlines how we collect, use, and protect personal information in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the England and Wales legal framework. This policy applies to videos taken during games, training sessions, and other club events, which may include individuals under the age of 18.

# 2. Legal Basis for Processing

We process personal data [for coaching and development purposes] under the legal basis of legitimate interest. We believe that sharing videos of games and training sessions helps to develop players and teams and thereby promotes the Club, encourage participation, showcase members' achievements, and improve performance. The footage is only used by a restricted group of coaches and [add details] who fully understand their responsibilities regarding the use and security of the data. Access to footage is restricted to Club members who agree to terms of usage via player agreements.

[Sometimes, requests are made to share the footage with others. We will always consider the rights and interests of individuals before sharing any videos.

We also use footage for social media usage to promote the club. We do this on the basis of legitimate interests because it is difficult to collect consent from all participant. To mitigate this, we issue notices informing that footage will be used for these purposes and we will ensure that all videos are approved by the Club's committee before being published on social media or other platforms.

## 3. Types of Personal Data Collected

In the context of this Privacy Policy, personal data refers to videos or images featuring identifiable individuals, such as players, coaches, and referees, participating in Club activities. This may include both under 18s, including children and adults.

### 4. How Personal Data is Collected

We collect personal data through video recordings taken during games, training sessions, and other Club events. These recordings may be captured by Club representatives, members, or third parties (such as professional videographers) on our behalf.

### 5. How Personal Data is Used

We use the personal data collected for the following purposes:

- Sharing videos on the Club's official social media platforms, website, and other communication channels
- Sharing videos with members and their families for personal use
- Analysing and providing feedback on performance for coaching and development purposes

- Allowing Club members to access footage via the system
- 6. Legitimate Interest and Parental Consideration

For individuals under the age of 18, we recognize the importance of balancing their interests and privacy rights. As such, we apply the principle of legitimate interest in the collection, use, and sharing of their personal data in the context of videos and images taken during Club activities. We always take into account the potential impact on the rights and freedoms of minors and act in their best interests.

In line with this, we inform parents or guardians of individuals under the age of 18 about our Privacy Policy and the Club's intention to record and share videos and images featuring their child through our published online policies and by displaying notices at our home ground gate. This ensures that parents or guardians are aware of our data processing practices when their child joins the Club or participates in activities involving video recording.

If a parent or guardian has any concerns or objections, they may express them to the Club at any time by contacting us using the contact details provided below. We will take these concerns into account and, where appropriate, limit or cease the processing of a minor's personal data in relation to videos and images.

We encourage open communication between parents or guardians, their children, and the Club to ensure that everyone is aware of and comfortable with our data processing activities. Data

#### 7. Data Retention

We will retain personal data for as long as it is necessary to fulfil the purposes for which it was collected or to comply with any legal, regulatory, or reporting requirements for a period of no longer than 3 years. After this period, personal data will be securely deleted or anonymized.

## 8. Data Security

We are committed to ensuring that your personal data is protected. We have implemented appropriate technical and organizational measures to safeguard personal data from unauthorized access, disclosure, alteration, or destruction.

#### 9. Data Subject Rights

Under UK GDPR, individuals have the right to:

- Request access to their personal data
- Request rectification of their personal data
- Request erasure of their personal data
- Object to the processing of their personal data
- Request restriction of processing their personal data
- Request data portability

To exercise any of these rights, please contact us using the contact details provided below.

### 10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to ensure it remains compliant with applicable laws and regulations. We encourage you to review this policy periodically to stay informed about how we process and protect your personal data.

### 11. Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy, please contact our Data Protection Officer at:

NPL Hockey Club 13 BROUGHTON AVENUE, RICHMOND, TW10 7TT. Email: <a href="mailto:info@nplhockey.co.uk">info@nplhockey.co.uk</a>, Phone: 07891138204

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