Gloucestershire CCC: Pathway Privacy Policy

Gloucestershire County Cricket Club (GCCC) are committed to protecting and respecting your privacy. This Privacy Policy explains how GCCC uses and protects your personal data, as well as your rights in respect of it, how to exercise your rights and how to contact us.

Information About Other People

If you provide information to us about any person other than yourself (such as someone you are making a booking for, an emergency contact, a professional representative or a colleague), you must ensure that they understand how their information will be used and that you are authorised to disclose it to us (and to consent to its use on their behalf) before doing so.

Our relationship with you

GCCC operates in many capacities, for example:

- as an employer
- as a website operator
- as a provider of goods and services to fans and customers
- as a supplier of services to other cricket organisations such as local cricket clubs or cricket leagues
- as the organiser of the professional game
- as a provider of support for volunteers
- as a customer of other organisations that provide services to us

You may be known to us in a number of ways. For example, we know that some of our employees also use our online booking facilities and are, therefore, also customers. In this Privacy Policy, all of the ways we know you are grouped together and referred to as 'Our Relationship'.

Data protection compliance

Unless we say otherwise in our Privacy Notice, GCCC is the data controller in respect of all personal data we obtain whether that is on the GCCC's website or as a result of Our

Relationship with you. This means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

IT IS IMPORTANT THAT YOU UNDERSTAND AND ARE COMFORTABLE WITH ALL PRIVACY TERMS BEFORE USING OUR WEBSITE(S) AND/OR BECOMING INVOLVED WITH THE GCCC AND WE ENCOURAGE YOU TO TAKE TIME TO READ THEM.

Where we obtain information

We obtain information from a wide variety of sources depending on the nature of Our Relationship or proposed relationship. We may obtain information:

- directly from you (or from someone who is requesting goods or services for you or is providing references or other supporting information to support Our Relationship)
- from other information we already hold as a result of Our Relationship
- from any device you use to communicate with us such as when accessing ECB websites or apps, from telephone conversations, emails and written and verbal communications including blogs and social media interactions
- from records of the goods and services provided to you. Some of this information may be obtained from the service providers we use, such as ticket agents
- from talent scouts and scouting data providers, the media, coaches, umpires and other match officials
- from third party data providers
- from agents, representatives and family members

We may supplement the information that you provide with other information that we obtain from our dealings with you (such as tickets you have purchased, newsletters you have subscribed to, events you or someone you book for have attended, your roles and achievements in cricket and details from other ECB services you have signed up for, use or have used, such as Play-Cricket and We Are England Supporters) or which we receive from other organisations, such as other cricket organisations, sponsors or commercial partners.

In the majority of cases we will be a data processor, for example where we have access to personal information via partner systems. Each of these systems will have their own Privacy Policy which can be viewed at your point of contact.
In some cases, we will be data controllers, for example where information is obtained directly by us through the means listed above or where we store personal data obtained through a partner system.

The Information we collect

The information we obtain about you and its sources will depend on the nature of Our Relationship. We will generally obtain:

- details of the GCCC services and opportunities you have expressed an interest in
- contact details
- date of birth, gender at birth, nationality and ethnicity (in each case, where relevant)

- details of any next of kin, family members and emergency contacts (in each case, where relevant)
- information about other cricket organisations you have a relationship with such as County Cricket Boards, cricket clubs or cricket leagues
- information about your eligibility to play, work for us, make purchases or take up our services
- medical and injury information (where relevant)
- payment details and details of returns or refunds (in each case, where relevant)
- supporting information that is relevant to Our Relationship such as photographs for accreditations, clothing size and any personalisation for kit or other items where we are supplying this, dietary requirements where you or someone else you are providing details for are attending an event or meeting where refreshments are being provided, allergy information or treatment that may need to be given
- audio-visual materials such as photographs and video recordings
- accreditations, qualifications and training
- match and playing statistics and scouting data
- anti-doping, disciplinary, safeguarding and anti-corruption information, including DBS information (criminal records checks) (in each case, where relevant)
- feedback
- survey responses
- your direct marketing preferences
- records of your interactions with us such as telephone conversations, emails and other correspondence
- details of any 'consents' you have given

How we will use your information

All personal information that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection legislation. Typically we use personal data for:

- **Administration –** Registration and general administration (including verification, vetting and security checking), creating and administering login credentials and access controls for online services and dealing with any payments
- **Delivery –** To provide the goods and services you request from us (including helping you with any specific needs you or others in your group may have)
- **Communication –** To communicate with you
- **Compliance –** to comply with our legal responsibilities
- **Safety and Safeguarding –** to ensure a safe environment to work in and for the enjoyment of cricket events and activities
- **Information Sharing –** so that we can provide information which may be of interest to you about services offered by GCCC, ECB or our Cricket Partners

- **Records –** for record-keeping purposes
- **Market Research –** to carry out market research so that we can improve the goods and services we offer
- **Service Development -** for research purposes and to enable us to understand requirements and develop cricket related services
- **Social Inclusion -** to keep under review equal opportunities within cricket and/or ethnicity information to enable us to monitor and ensure compliance with antidiscrimination policies and/or to comply with our obligations to Sport England
- **Analysis –** to track and analyse activity on our website/social media platforms and to understand the interests and views of all those involved in cricket
- **Getting to know you -** to create an individual profile for you so that we can enhance your user experience, to understand and respect your preferences and to provide newsletters and details of any relevant offers and opportunities where you have agreed to receive them

Consent and lawful processing of your personal data

The legal basis for the collection and processing of your personal data is:

- **for administration and service delivery:** that it is necessary to fulfil the contract that you are going to enter into or have entered into with us
- **for dealing with medical needs:** that you have given your explicit consent or, in serious cases that it is in your vital interests to help you
- **for direct marketing and/or information sharing:** that you have given your consent
- **for equality and inclusion:** that you have given your explicit consent by answering the question
- **in all other cases:** that it is necessary for our legitimate interests which are to encourage participation in cricket and this does not prejudice or harm your rights and freedoms

Disclosing your personal information

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies and mailing houses. In these

circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.
Some limited information may be shared with other stakeholders in Cricket, such as other cricket clubs, Constituent Bodies, league organisers, so they can maintain appropriate records and assist us in administering and organising cricket fixtures.

Cricket Organisations

GCCC has relationships with other cricket related organisations such as the ECB, County Cricket Boards, cricket clubs and cricket leagues (each a Cricket Organisation) and some of the goods and services available on or through ECB Websites are provided by those Cricket Organisations. Each Cricket Organisation has its own privacy practices and you should check that you are satisfied with them before you provide any personal information to them.

Retention and data storage

When we store data, reasonable measures are taken to protect personal information from access by unauthorised persons. This information will be stored, archived and backed up as part of internal systems which are hosted by our cloud-based service providers. This will include encrypting all databases that contain personal data.
When we do store information, we keep it for the following periods:

- Information obtained that is relevant to the delivery of a service will be retained for 12 months from the date of that service being completed
- Records and documents relating to contracts and insurance policies will be retained for 7 years after the end of the contract or policy.
- Information and documents relating to unsuccessful job applicants will be retained for 6 months from date of notification to the candidate

Where else does data go?

As a principle we do not share any of the personal information that we hold. However, in the course of running our business some data does get transferred outside of our organisation. For example, where we contract deliverers or cricket partners/associations to provide services on our behalf we may be required to provide them with the data required to provide that service safely and effectively.

Updating and correcting information

You may update or correct your personal data online in relevant membership areas or by contacting us in writing or by email. Please include your name, address and/or email address

when you contact us as this helps us to ensure that we accept amendments only from the correct person. We encourage you to promptly update your personal data if it changes.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

Your rights

You have a number of legal rights in respect of your personal data.

PLEASE NOTE, SOME OF THE LEGAL RIGHTS SHOWN BELOW ARE SUBJECT TO EXCEPTIONS WHICH MEANS THAT WE MAY BE ENTITLED, OR REQUIRED, TO REFUSE TO COMPLY WITH A REQUEST.

Your rights include:

right of access. The right to receive a copy of the personal data that we hold about you. 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.

right to withdraw consent to direct marketing. You can exercise this right at any time and can update your preferences yourself or ask us to do it for you. See section 'Updating and correcting information' above for details.

right to withdraw consent to other processing. Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect a new activity and does not mean that processing carried out before you withdrew your consent is unlawful.

right to rectification. If you consider any of your personal data is inaccurate, you can correct it yourself or ask us to do it for you (see section 'Updating and correcting information' above for details).

right of restriction. In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified.

right of erasure. In some circumstances, for example, where we have no legal basis for retaining your personal data, you may be entitled to require us to delete your personal data.

right to object. Where our processing is based on it being in our legitimate interests, your rights and freedoms, based on your particular situation, may enable you to object to our processing.

right of portability. 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.

right to complain. 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 (see 'How to contact us' below). You can also contact the Information Commissioner's Office at www.ico.org.uk.

How to contact us

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