

Southampton Gymnastics Club – Privacy Policy

Introduction and Scope

This Privacy Notice explains how Southampton Gymnastics Club (“SGC”, “we”, “us”) collects, uses, shares and protects personal data relating to gymnasts, parents or carers, volunteers, staff and others who interact with us. We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which require information to be used lawfully, fairly and transparently, only for specified purposes, kept accurate, stored securely, and retained only for as long as necessary.

How We Collect Personal Data

We collect personal information through registration forms, our website, email communication, telephone calls, in person discussions and, where required, from British Gymnastics for membership related processes. Where cookies or similar tracking technologies are used on our website, we comply with the Privacy and Electronic Communications Regulations (PECR) and ICO guidance.

Definitions

Personal Data

Information relating to an identified or identifiable individual (e.g., name, date of birth, contact details, medical information).

Data Subject

Any living individual whose personal data we process, including gymnasts, parents, carers, staff or volunteers.

Data Controller

The organisation responsible for deciding how and why personal data is processed. SGC is the Data Controller.

Processing

Any operation performed on personal data, including collection, storage, use, sharing or deletion.

Legitimate Interests

A lawful basis allowing organisations to use personal data where it is necessary for operational reasons, reasonably expected and balanced against individual rights. British Gymnastics guidance confirms legitimate interests may apply to coaching photography, safeguarding, and other club operations.

Special Category Data

Sensitive information such as health or medical data requiring additional protection and specific legal conditions before processing.

Subject Access Request (SAR)

A right under UK GDPR that allows individuals to request access to their personal data.

Unreasonable or Unacceptable Behaviour

Behaviour that is abusive, threatening, intimidating or persistently excessive. The ICO recognises that organisations may need to record and manage such behaviour to protect staff while still meeting their legal obligations.

Who We Are and How to Contact Us

Data Controller: Southampton Gymnastics Club

Email: admin@sotongym.co.uk

Phone: 02380 529 952

Postal Address: Southampton Gymnastics Club, Cuckmere Lane, Southampton, Hampshire, SO16 9AR

Categories of Personal Data We Process

- Identity information (e.g., name, date of birth)
- Contact details
- Emergency contact information
- Medical or health information
- Membership and attendance information
- Payment and finance data
- Competition and event information
- Photos and video (coaching/safeguarding; promotional only with consent)

Data Protection Principles

We follow the UK GDPR principles of:

lawfulness, fairness and transparency; purpose limitation; data minimisation; accuracy; storage limitation; security; and accountability.

Why We Use Your Data (Purposes) and Our Lawful Bases

Membership Administration and Class Delivery

Used to register members, manage bookings, run classes, contact you about essential matters and deliver contracted services.

Lawful Basis: Performance of a contract.

Payments and Financial Management

Used to collect fees, issue refunds and maintain financial records.

Lawful Basis: Performance of a contract; legal obligations for financial records.

Safety, Risk Assessment and Inclusion

Used to review health information, carry out risk assessments and identify reasonable adjustments.

Lawful Basis: Legitimate interests in delivering a safe environment; safeguarding/health & safety obligations.

Coaching and Performance Development

Used to take coaching photographs or recordings to support technique and safeguarding.

Lawful Basis: Legitimate interests (coaching quality/safety).

Promotions, Marketing and Communications

Used to send club news or publish images publicly (with consent). Electronic marketing and non-essential cookies require consent under PECR.

Lawful Basis: Consent (withdrawable at any time).

Responding to Enquiries or Complaints

Used to investigate issues, provide support and communicate effectively.

Lawful Basis: Legitimate interests; legal obligations where applicable.

British Gymnastics Membership and Competitions

Used for registering membership, competitions, courses and compliance, in line with BG's membership updates.

Lawful Basis: Contract and legitimate interests.

Safeguarding, Health and Safety, and Legal Compliance

Used to meet safeguarding responsibilities, respond to incidents and comply with regulatory duties.

Lawful Basis: Legal obligations; legitimate interests.

Managing Unreasonable or Unacceptable Behaviour

Used to record and manage abusive, threatening or persistently unreasonable behaviour to protect staff safety.

Lawful Basis: Legitimate interests in protecting staff and maintaining safe operations.

Photography and Filming

Coaching related images or video are used under legitimate interests.

Promotional use (e.g., website, social media, publications) requires explicit consent,

especially for children.

All use complies with SGC and British Gymnastics safeguarding policies.

Sharing Your Information

We may share personal data with:

- British Gymnastics for membership, competitions, safeguarding and compliance, following BG's membership system and guidance.
- Service providers acting under our direction (e.g., IT, payment services).
- Emergency services or safeguarding authorities when necessary to protect vital interests.

No personal data is sold.

International Data Transfers

If any service provider processes data outside the UK, we implement appropriate safeguards such as the UK Addendum to Standard Contractual Clauses. Otherwise, we ensure data remains stored within the UK.

Cookies and Website Tracking

Our website may use cookies or similar technologies. Non-essential cookies are only activated with your consent in accordance with PECR and ICO guidance. You can adjust cookie preferences through your browser or our cookie banner.

Unreasonable or Unacceptable Behaviour

We expect all individuals to act respectfully. In line with ICO guidance, we may record and manage incidents of abusive, threatening or persistently unreasonable behaviour to protect staff welfare, while still meeting statutory obligations such as responding to valid SARs.

Your Rights

You have the right to:

- Be informed
- Access your data
- Rectify inaccuracies
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing
- Data portability (where applicable)

- Withdraw consent (e.g., marketing, promotional imagery)

These rights reflect UK GDPR protections.

Subject Access Requests (SARs)

You may request a copy of your personal data at any time. We will respond within one calendar month, or within one month of receiving identity verification if needed. Extensions of up to two months may apply for complex or multiple requests.

We may request identification to protect privacy and may lawfully withhold data where disclosure affects others' rights or is restricted by law.

Submit SARs to: admin@sotongym.co.uk

Data Retention

We retain personal data only as long as necessary for operational, legal or safeguarding purposes, in line with the storage limitation principle and ICO recommendations. Retention schedules are available on request.

Children's Data

We give special consideration to children's data and obtain parental consent where required. Our practices align with UK GDPR, ICO expectations and British Gymnastics' safeguarding guidance.

Data Protection Fee

SGC is required to pay a data protection fee to the ICO. This supports the ICO's regulatory functions.

How to Complain

If you have concerns about how we use your data, please contact us first. You may also contact the Information Commissioner's Office (ICO): 0303 123 1113. Further contact information is available on the ICO's website.

Changes to This Notice

We review this privacy notice regularly to ensure it reflects changes in legislation and British Gymnastics guidance.

Last updated: 20 February 2026