

IAPS – Privacy Notice and annexes

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the DPA and place an emphasis on making privacy notices understandable and accessible. Data controllers are expected to take ‘appropriate measures’ to ensure that this is the case.

The association interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the association processes their personal data must be:

- concise, transparent, intelligible and easily accessible
- written in clear and plain language and
- free of charge

These requirements are about ensuring that privacy information is clear and understandable for data subjects. This privacy notice deals with the overall privacy responsibilities of the association but includes, as annexes, notices for staff and board members. The appropriate annex should be read by the appropriate data subject along with the overarching notice.

Each annex deals with two sources of data, that obtained directly from the subject and data not obtained directly from the subject. For both sources the identity and contact details of the data handler (and, where applicable, the handler’s representative) and the data protection officer are provided.

The intention is that each privacy notice is used as a stand-alone document, introduced and covered by the paragraphs above.

Annex A	Council
Annex B	Office holders and employees
Annex C	Members
Annex D	Children participating in IAPS sports events
Annex E	Adults participating in IAPS courses and conferences

Privacy Notice IAPS – Council members

This annex should be read in conjunction with the introductory paragraphs in the covering document.

The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)

Data will be processed for the purposes of responding to requests for information about joining Council and the association will therefore have a “legitimate interest” for processing basic personal data and, if necessary, sensitive personal data. The data the association holds will be the minimum it requires.

(Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.)

The association will share your data with the following companies who have contracts with the association and who have equalled the association’s precautions, systems and procedures for dealing with data. These are:

- IT contractor (TCNS)
- Bankers (RBS)
- Auditors (Haysmacintyre)
- Investment advisors (Rathbones)
- Database providers (Chapel Studios)

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the association organises. Should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

(The retention period for the data or the criteria used to determine the retention period.)

The retention period for data on members of Council to be held will be as detailed in the association’s data retention policy.

(The existence of each data subject’s rights. The right to withdraw consent at any time.)

You have the right to withdraw your consent to data processing at any time; however this will only apply to certain groups of data for which you have given consent.

(The right to lodge a complaint at any time with a supervisory authority.)

You can complain at any time about how the association has handled your data; a template letter, should you need it is at appendix 1 to this notice. The Information Commissioner is available as follows: ICO helpline is 0303 123 1113.

(Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.)

(For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)

We will obtain the data the association requires from you. Should we need data from other sources we will contact you first.

(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)

We see the provision of personal data as necessary to safeguard you and the association as it will allow the necessary checks to be made.

(The existence of automated decision-making, including profiling and the information about how decisions are made, the significance and the consequences.)

There is no automated decision making or profiling involved in this data stream into and through the association.

Privacy Notice IAPS – office holders and employees of the association and those applying for positions

This annex should be read in conjunction with the introductory paragraphs in the covering document. It applies to the Chairman and Vice Chairman; staff at HQ; mentors; subject leaders and helpline providers.

The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)

Data will be processed for the purposes of meeting the association’s legal and contractual obligations and thus has a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to form and maintain the contract between you and the association.

(Any recipient or categories of recipient must be clear and it should also be clear if there is data transfer to other countries and the safeguards in place.)

The association will share your data with the following companies who have contracts with the association which require them to meet the association’s precautions and systems for dealing with data. These are:

- IT contractor (TCNS)
- Bankers (RBS) – where applicable
- Auditors (Haysmacintyre) – where applicable
- Investment advisors (Rathbones) – where applicable
- Database providers (Chapel Studios)
- Payroll bureau (Francis Webb)
- Pension provider (Aegon, NEST and Origin)
- DBS provider
- Private medical insurers (Aviva and Health Shield)
- Permanent health insurers (Aviva)
- Death in service insurers (Canada Life)

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the association organises. Should this be envisaged for you,

you will be contacted for your consent, the consent will be limited in time and content if it be required.

(The retention period for the data or the criteria used to determine the retention period.)

The retention period for employee data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association finds itself under.

(The existence of each data subject's rights. The right to withdraw consent at any time.)

You have the right to withdraw your consent to data processing at any time; however this will only apply to certain groups of data for which you have given consent.

(The right to lodge a complaint at any time with a supervisory authority.)

You can complain at any time about how the association has handled your data; a template letter, should you need it, is at appendix 1 to this notice. The Information Commissioner is available as follows: ICO helpline is 0303 123 1113.

(Where data is not obtained directly, the source from which it was obtained and if it is a publicly available source.)

(For data obtained indirectly, the privacy notice should be provided within one month (referred to as a reasonable period), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)

We will obtain the data the association requires from you. Should we need data from other sources we will contact you within a month.

(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)

We see the provision of personal data as necessary to properly employ you at the association and to administer, and for the association to fulfil its obligations under the contract once you are a worker for IAPS.

(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)

There is no automated decision-making or profiling involved in this data stream into and through the association.

Privacy Notice IAPS – members of the association, or applying to join the association

This annex should be read in conjunction with the introductory paragraphs in the covering document.

The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)

Data will be processed for the purposes of responding to requests for information about joining the association and the association will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to form and maintain the contract between you and the association.

(Any recipient or categories of recipient must be clear and it should also be clear if there is data transfer to other countries and the safeguards in place.)

The association will share your data with the following companies who have contracts with the association and who have equalled the association’s precautions and systems for dealing with data. These are:

- IT contractor (TCNS)
- Database providers (Chapel Studios)

The association will share your data with its other members including, but not limited to, the membership committee, regional groups and members. If you consent, your details will also be included in the list of members.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the association organises. Should this be envisaged for you, you will be contacted for your consent; the consent will be limited in time and content if it be required.

(The retention period for the data or the criteria used to determine the retention period.)

The retention period for membership data will be in accordance with the association’s data retention policy and / or be modified by any other legal obligations the association finds itself under.

(The existence of each data subject's rights. The right to withdraw consent at any time.)

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given consent.

(The right to lodge a complaint at any time with a supervisory authority.)

You can complain at any time about how the association has handled your data; a template letter, should you need it, is at appendix 1 to this notice. The Information Commissioner is available as follows: ICO helpline is 0303 123 1113.

(Where data is not obtained directly, the source from which it was obtained and if it is a publicly available source.)

(For data obtained indirectly, the privacy notice should be provided within one month (referred to as a reasonable period), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)

We will obtain the data the association requires from you. Should we need data from other sources we will contact you within a month.

(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)

We see the provision of personal data as necessary to properly engage with you as member and to provide the services that the association offers.

(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)

There is no automated decision making or profiling involved in this data stream into and through the association.

Privacy Notice IAPS – Children participating in IAPS events and competitions

This annex should be read in conjunction with the introductory paragraphs in the covering document.

The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)

Data will be processed for the purposes of responding to requests to enter and the participate in IAPS sports events and other competitions, including iArt, and the association will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to allow the association to run these events fairly and safely and to meet any NGB rules.

(Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.)

The association will share your data with the following companies and third parties who have contracts with the association and who have equalled the association’s precautions and systems for dealing with data. These are:

IT contractor	(TCNS)
Database providers	(Chapel Studios)
Venues	
Officials and organisers	

It is not necessary for data to be shared with other countries. The exception to this will be international events (usually only the ski championships) that the association organises. Should this be envisaged for you, you will be contacted for your consent; the consent will be limited in time and content if it be required.

(The retention period for the data or the criteria used to determine the retention period.)

The retention period for participant’s data in accordance with the association’s data retention policy and / or be modified by any other legal obligations the association finds itself under.

(The existence of each data subject's rights. The right to withdraw consent at any time.)

You have the right to withdraw your consent to data processing at any time; however this will only apply to certain groups of data for which you have given consent.

(The right to lodge a complaint at any time with a supervisory authority.)

You can complain at any time about how the association has handled your data; a template letter, should you need it, is at appendix 1 to this notice. The Information Commissioner is available as follows: ICO helpline is 0303 123 1113.

(Where data is not obtained directly, the source from which it was obtained and if it is a publicly available source.)

(For data obtained indirectly, the privacy notice should be provided within one month (referred to as a reasonable period), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)

We will obtain the data the association requires from you; should we need data from other sources we will contact you within a month.

(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)

We see the provision of personal data as necessary to properly provide the events and competitions without which the association would be unable to administer and run the events and competitions fairly and safely.

(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)

There is no automated decision making or profiling involved in this data stream into and through the association.

Privacy Notice IAPS – Adult participants in IAPS events, courses and conferences

This annex should be read in conjunction with the introductory paragraphs in the covering document.

The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)

Data will be processed for the purposes of responding to requests for information about joining the association (including registering for a course or conference) and the association will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the association holds will be the minimum it requires to form and maintain the contract between you and the association (including any event you are booked to attend).

(Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.)

The association will share your data with the following companies who have contracts with the association and who have equalled the association’s precautions and systems for dealing with data. These are:

IT contractor	(TCNS)
Database providers	(Chapel Studios)
Venues	
Other delegates	
Speakers	
Exhibitors/sponsors	
Guests/officials	

It is not necessary for data to be shared with other countries. The exception to this will be for overseas courses or events that the association organises. Should this be envisaged for you, you will be contacted for your consent; the consent will be limited in time and content if it be required.

(The retention period for the data or the criteria used to determine the retention period.)

The retention period for participant's data will be in accordance with the association's data retention policy and / or be modified by any other legal obligations the association finds itself under.

(The existence of each data subject's rights. The right to withdraw consent at any time.)

You have the right to withdraw your consent to data processing at any time; however this will only apply to certain groups of data for which you have given consent.

(The right to lodge a complaint at any time with a supervisory authority.)

You can complain at any time about how the association has handled your data; a template letter, should you need it, is at appendix 1 to this notice. The Information Commissioner is available as follows: ICO helpline is 0303 123 1113.

(Where data is not obtained directly, the source from which it was obtained and if it is a publicly available source.)

(For data obtained indirectly, the privacy notice should be provided within one month (referred to as a reasonable period), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)

We will obtain the data the association requires from you. Should we need data from other sources, we will contact you within a month.

(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)

We see the provision of personal data as necessary to properly provide the events, courses and conferences without which the association would be unable to administer and run the activity safely and effectively.

(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)

There is no automated decision-making or profiling involved in this data stream into and through the association.

Appendix 1 – Template complaints letter

[Your full address]
[Phone number]
[The date]

IAPS
11 Waterloo Place
Leamington Spa
CV32 5LA

Dear Sir / [name of the person you have been in contact with]

Information rights concern

[Your full name and address and any other details such as an account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website (www.ico.org.uk) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours sincerely
[Signature]