



London Frontrunners

Data Protection Policy

This Data Protection Policy (the Policy) has been made under Articles 26 and 27(a) of the Constitution and shall be binding upon all Club members unless and until it is repealed.

General Statement of Data Protection Policy

1. The London Frontrunners (the Club) takes its members' right to protection of personal data and its own obligations under the General Data Protection Regulation (GDPR) seriously. The objectives of this Policy are to respect Club members' rights to protection of personal data and to fulfil the Club's obligations under the GDPR 2018, including by complying with the principles as set out in Article 5 of the GDPR.¹
2. For the purpose of this Policy, "personal data" means any data which relate to a living individual who can be identified from that data. This includes, but is not limited to, data provided by Club members via WebCollect when joining the Club or renewing their membership and photographs of Club members taken by, or for Committee members, for use on Facebook, the Club website and other promotional materials.
3. Pursuant to the objects of the Club as set out in Article 2 of the Constitution, the Club engages in running, training and coaching in public, and publicly and clearly identifies itself as a Club for the promotion of LGBT+ people in running. Personal data held by the Club shall be collected and used in accordance with paragraphs 4 to 9 and in light of the objects of the Club.

¹ Those principles are: a) processed lawfully, fairly and in a transparent manner in relation to individuals; b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes; c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay; e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The Collection of Personal Data

4. The Club shall only require such personal data from individuals when joining the Club and from Club members when renewing their membership as is necessary (a) for the purposes of complying with the requirements of UK Athletics, England Athletics and other sports bodies with which the Club is affiliated, and (b) for the effective management of the Club. Other personal data may be requested on a voluntary basis in order to monitor the breakdown of the Club membership by personal characteristics and help ensure the Club is meeting its constitutional objectives, but shall not be required.² The information you give us may include your name, date of birth, address, e-mail address, phone number, name of the EA affiliated Clubs with which you are registered and gender.
5. The Club shall only collect further personal data from Club members as is necessary for the effective management of the Club.
6. Where the Club takes photographs and videos during events for the purposes of publicising the Club on its website, social media and for other promotional purposes, Club members identifiable in such photographs or videos shall be free to refuse consent for those photographs or videos to be used by informing the person taking the photo or video or by emailing the Club at info@londonfrontrunners.org.

The Use of Personal Data

7. Committee members shall be conscious of if and when they use Club members' personal data and shall only use it for the purposes set out in paragraphs 4, 5 and 6 of this Policy. The reason we need your data is to be able to administer your membership and provide the membership services you are signing up to when you register with the Club. Our lawful basis for processing your personal is that we have a contractual obligation to you as a member to provide the services for which you are registering.
8. Committee members shall ensure that when they use Club members' personal data, it is never made available through any public forum (including, but not limited to, the website, eBulletins and other communications, Facebook and Twitter) without that Club member's consent. In particular:

² The Club's objectives, as set out in Article 2 of the Constitution, are (a) to encourage and promote running amongst LGBT+ persons in London, including, but not limited to, those who identify as lesbian, gay, bisexual or trans*; and (b) to provide opportunities for training and coaching for LGBT+ runners in London, including, but not limited to, those who identify as lesbian, gay, bisexual or trans*.

- a. The weekly eBulletin will not contain the name or photographs of any Club member unless they have consented to their name and/or photograph being included;
 - b. Photographs of Club members will not be uploaded and/or tagged on Facebook or the Club website unless those persons identifiable in the photos have consented; and
 - c. Race results published in the eBulletin and the Club website will only include Club members who have explicitly or implicitly consented. For the purpose of this paragraph, consent shall be considered as having been given implicitly where the individual has participated in a race having registered for it as a member of the Club, where the results are automatically generated indicating that the individual is a member of the Club basis (such as via Power of 10 or Park Run) or where the published results otherwise include the fact that the individual is a member of the Club.
9. Where it is necessary to use Club members' personal data temporarily to carry out Committee responsibilities, Committee members shall ensure that any locally stored personal data is retained for only as long as is necessary and is then deleted. This included personal data stored on personal computers, laptops, mobile phones or any other devices.
10. Anonymised data may be used by the Committee to monitor Club trends and the breakdown of the Club by personal characteristics in order that the Club meets its constitutional objectives. Anonymisation is the process of removing personal identifiers, both direct and indirect, that may lead to an individual being identified. The GDPR does not apply to anonymised information in accordance with Recital 26 of EU GDPR.
11. We will hold your personal data on file for as long as you are a member with us. Any personal data we hold on you will be securely destroyed after four years of inactivity on that member's account, in line with England Athletics Limited's retention policy.

Rights and Responsibilities of Club Members

12. It is the responsibility of Club members to ensure that their personal data recorded on WebCollect are kept accurate and up-to-date. As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.
13. The Club communicates through a number of third party platforms including, but not limited to, Facebook and Twitter. All members are free to join these pages. If you join one of the Social Media pages, please note that provider of the social media platform(s) have their own privacy policies and that the Club does not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on these platforms.
14. Any Club member who feels that their personal data has been misused, whether in contravention of this Policy or otherwise, may contact the Committee via info@londonfrontrunners.org.