



# Privacy Policy

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## **Privacy Policy**

### **Chapter 1** Introduction

We at the European Rugby League Federation (“we”, “our” or “us”) are committed to respecting your privacy and want to make sure all the personal information we have collected about you is safe and secure.

This Policy set outs our commitments to you, in compliance with and beyond the General Data Protection Regulation (commonly known as the “GDPR”) and explains how we collect, store and use your personal information.

We will ensure the highest level of commitment to your personal information. If you have any questions about this Policy or what we do with your personal information, please contact us via the details set out in section 17 below.

Collecting specific, relevant personal information is a necessary part of us providing both you and the sport of Rugby League with an excellent service. When we hold or use your personal information, we will provide you with details covering what information we hold, how your personal information may be used, the basis for this use and details of your rights.

Where we collect personal information from you directly, we will provide or signpost you towards this information at the time we collect the personal information from you. Where we receive your personal information indirectly, you will either receive this information at the time your personal information is collected, or when we first contact you.

### **Chapter 2** How do we process your personal information?

In most cases we will be a data controller of your personal information. A data controller controls how personal information is processed and used. We will use your personal information as described in section 6 below.

A data processor processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller. In any case where we are not a data controller, this means that you cannot exercise your rights against us directly, but you can do so against the data controller (i.e. the person who controls how we process the personal information). In these cases we will inform you who is the data controller of your personal information so that you can direct any such requests to them.

### **Chapter 3** Personal information we may collect from you

When you sign up to access any services that we provide, , you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details which allow us to contact you directly, such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your participation and/or attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

#### **Chapter 4 *Players/Participants***

If you are a player/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following additional personal information from you:

- identification documents such as passport and identity cards;
- details of any club and/or league and/or other membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any player rankings, gradings or ratings, competition results, details regarding events/matches/games attended and performance (including that generated through player pathway programmes);
- any disciplinary and grievance information; and
- any details required for the purposes of awarding scholarship funding or grants (including any means testing).

#### **Chapter 5 *Coaches and Match Officials***

If you have registered with us to receive more information about coaching and/or training and/or qualification programmes, you may also provide us with or we may obtain the following additional personal information from you:

- any coaching code or official number;
- your current member club or other organisation (if applicable);
- coaching/teaching qualification and/or officiating history and any player rating (if any);
- accreditation/qualification start and end date; and

- identification documents such as passport, utility bills, identity cards, etc.

## **Chapter 6** Special categories of personal information

We may also collect, store and use the following “special categories” of more sensitive personal information regarding you:

- information about your race or ethnicity, religious beliefs and sexual orientation; and
- information about your health, including any medical condition, health and sickness records, medical records and health professional information.

It may be that we do not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below, we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

## **Chapter 7** Where we collect your information

We typically collect personal information when you sign up to receive services, apply to become a member, apply to complete a coaching/match official course or qualification, make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a player/participant of Rugby League we also may collect personal information about you from any club, school, college, university or other organisation you are affiliated with .

If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that

information. Please share this Privacy Policy with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in section 11 below.

## Chapter 8 How we use the information

The table below describes the main purposes for which we process your personal information, the categories of your information involved and the lawful basis for being able to do this.

## Chapter 9 All Individuals

Purpose	Personal Information Used	Lawful Basis
To administer any membership account(s) you have, manage the relationship with you and dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to properly manage and administer your membership contract with us. Where appropriate, you have given us your explicit consent to do so.
To arrange and manage any contracts for the provision of any merchandise, products and/or services.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.
To send you information including details about ticket information, newsletters, information about Membership, participation products, competitions and events, partner offers and discounts, merchandise launches/offers, surveys, , fixture streaming details/offers and any updates on Rugby League	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us where applicable. We have a legitimate interest to provide services to you where you have an interest in rugby league to further our objectives. Where appropriate, you have given us your explicit consent to do so

Purpose	Personal Information Used	Lawful Basis
To send you marketing information about or on behalf of commercial partners	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. For criminal records history we process on the basis of legal obligations or based on your explicit consent. We have specific retention policies in relation to compliance and safeguarding matters and have a legitimate interest in retaining such records for varying lengths of time. Where we process medical information we retain it for 10 years (or 10 years from the age of 18 where appropriate) unless this data is anonymised.

Purpose	Personal Information Used	Lawful Basis
The security of IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your participation and/or attendance at any events or competitions.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so except where such is not possible (i.e crowd photos from events, where you will be notified of such as part of your ticket purchase).
To comply with health and safety requirements	Records of attendance	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.

## Chapter 10 Players & Participants

Purpose	Personal information used	Lawful basis
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any player pathway programme	All performance and attendance data and information about your health and medical condition. Details of any member club and/or other membership.	This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To make decisions about your progression and development through any player pathway programme and to assist with the delivery of rankings and ratings	All performance and attendance data and information about your health. Details of any member club and/or other membership.	This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To administer and monitor your participation and/or attendance at events and competitions	All non-medical performance and attendance data. Details of any member club and/or other membership.	This is necessary to enable us to register you on to and properly manage and administer your development through the performance programme.
To arrange for any trip or transportation to and from an event	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.

Purpose	Personal information used	Lawful basis
To administer any drug and alcohol testing	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to sports facilities and to monitor and manage sickness absence	Health and medical information	We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect including any disciplinary and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

Purpose	Personal information used	Lawful basis
To gather evidence for potential and actual compliance cases	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any compliance cases. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To assess your eligibility for and to provide any scholarship funding and/or grants	All details required for the purposes of awarding scholarship funding or grants (including any means testing)	This is necessary to enable us to properly administer and perform any contract for the provision of funding.
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and performance data	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.

Purpose	Personal information used	Lawful basis
To send you information including details about advanced ticket information, newsletters, information about Membership, participation products, competitions and events, partner offers and discounts, merchandise launches/offers, surveys, , fixture streaming details/offers and any updates on Rugby League	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us where applicable. We have a legitimate interest to provide services to you where you have an interest in rugby league to further our objectives. Where appropriate, you have given us your explicit consent to do so
To send you marketing information about or on behalf of commercial partners	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

## Chapter 11 Coaches & Match Officials

Purpose	Personal information used	Lawful basis
To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction and payment data. Details of your current member club or other, coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
To conduct performance reviews, managing performance and determining performance requirements	All performance and attendance data and information about your health. Details of your current member club or other, coaching/teaching qualifications and/or officiating history. Qualification start and end dates.	This is necessary to enable us to properly manage and administer your development through the course and/or programme. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To make decisions about your progression and accreditation status	As above	As above
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

Purpose	Personal information used	Lawful basis
To gather evidence for potential and actual compliance cases	All the personal information we collect.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any compliance cases. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To administer any drug and alcohol testing	Health Information	We have a legal obligation and a legitimate interest to provide you & other members of our organisation with a safe environment in which to participate in sport. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.
To arrange for any trip or transportation to and from an event	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 4 above.

Purpose	Personal information used	Lawful basis
To send you information including details about advanced ticket information, newsletters, information about Membership, participation products, competitions and events, partner offers and discounts, merchandise launches/offers, surveys, fixture streaming details/offers and any updates on Rugby League	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us where applicable. We have a legitimate interest to provide services to you where you have an interest in rugby league to further our objectives. Where appropriate, you have given us your explicit consent to do so
To send you marketing information about or on behalf of commercial partners	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your position as a member.

For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in section 17 below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent.

Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## **Chapter 12** Direct Marketing

From time to time, we may contact you by email, post, phone or SMS with information about products and services we believe you may be interested in.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages by or emailing us at [info@europeanrugbyleague.com](mailto:info@europeanrugbyleague.com)

You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## **Chapter 13** Disclosure of your personal information

Generally we share information where we need to do so in order to run our organisation or the sport of Rugby League generally (e.g. where other people process information for us or are required to process information for the benefit of Rugby League). In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

We share personal information with the following parties:

- Any party approved by you or notified to you at the point of data collection;
- To any governing bodies, leagues or clubs to allow them to properly administer Rugby League on a local, regional, national and international level;
- Other service providers: for example, email marketing specialists, payment processors, data analysis, promotional advisors, contractors or suppliers and IT services (including CRM, website, video and teleconference services);
- Our supply chain partners and sub-contractors, such as couriers, import/export agents and shippers;

- Our commercial partners: for the purposes of providing you with information on any tickets, special offers, opportunities, products and services and other commercial benefits provided by our commercial partners either as part of your membership package or where you have given your express for us to do so;
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives;
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security;
- Certain parties who act as joint Data Controllers or Data Processes in relation to services that we provide. You will be notified where this is the case;
- Those who we are required to share your personal information with for the purpose of monitoring betting and/or anti-doping for the purposes of compliance cases.

We do not disclose personal information to anyone else except as set out above.

#### **Chapter 14** Transferring your personal information internationally

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in.

We will take all reasonable steps to ensure that your personal information is only used in accordance with this Privacy Policy and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in section 17 below.

#### **Chapter 15** How long do we keep personal information for?

We will only hold your information for as long as is necessary. Where you ask us to delete records, we may delete it earlier, subject to any retention requirements.

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of 6 years after your last contact with us.

Exceptions to this rule are:

- Information that may be relevant to personal injury claims, or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after you have worked with us;
- Where we have specific internal policies relating to the retention of data for compliance matters;
- Where we have specific internal policies relating to the retention of medical data;
- Where we have specific internal policies relating to the retention of data for other valid reasons.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address.

You will be able to update some of the personal information we hold about you through contacting the ERLF or by using the details set out in section 17 below.

## **Chapter 16** Your rights in relation to personal information

You are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in section 17 below. You can also unsubscribe from any direct marketing by clicking on the unsubscribe link in the marketing messages we send to you.

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;

- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this Privacy Policy sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

If you are unhappy with the way we are using your personal information, we are here to help and would encourage you to contact us to resolve your complaint by using the contact details set out in section 17 below.

## **Chapter 17** Linking with Third Party sites

Our Site may, from time to time, contain links to and from the websites of commercial partners, Rugby League Bodies, advertisers and clubs. If you follow a link to any of these websites, please note that these websites have their own privacy policies and they will be a data controller of your personal information. We do not accept any responsibility or liability for these policies and you should check these policies before you submit any personal information to these websites.

In addition, if you linked to this Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

## **Chapter 18** Security

We employ a variety of technical and organisational measures to keep your personal information safe and to prevent unauthorised access to, or use, or disclosure of it. Unfortunately, no information transmission over the Internet is guaranteed 100% secure nor is any storage of information always 100% secure, but we do take all appropriate steps to protect the security of your personal information.

Where third-party providers store data on our behalf, we endeavour to ensure they are certified to ISO levels and/or comply with industry best practice.

## **Chapter 19** Cookies

Certain parts of our Site may use "cookies" to keep track of your visit and to help you navigate between sections. For more details please see our Cookie Policy.

## **Chapter 20** Log Files

In common with most websites, our Site logs various information about visitors, including internet protocol (IP) addresses, browser type, internet service provider (ISP) information, referring / exit pages and date / time stamp.

We may use this information to analyse trends, administer the Site, track your movement around the Site and gather broad demographic information.

## **Chapter 21** Changes to this Policy

You are encouraged to check back regularly for updates to our Privacy Policy, as we may make changes at any time. When we change this Policy in a material way, we will update the version date at the bottom of this page. Please check back frequently to see any updates or changes to this Policy and should you object to any alteration, please contact us as set out in section 17 below.

## **Chapter 22** Contact

In the event of any query or complaint in connection with the information we hold about you, please email [info@europeanrugbyleague.com](mailto:info@europeanrugbyleague.com) or write to us at DPO, European Rugby League Federation, 55 King Street Manchester M2 4LQ