

Commonwealth Games Wales Privacy Notice

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INTRODUCTION

Welcome to the Commonwealth Games Wales privacy notice.

Commonwealth Games Wales (collectively referred to as "Commonwealth Games Wales", "CGW", "we", "us" or "our" in this privacy notice), respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data and will tell you about your privacy rights and how the law protects you.

Please use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how Commonwealth Games Wales collects and processes your personal data.

We do not collect data relating to children under the age of 13 without agreement from the individual who has parental responsibility for them. We do not use automated processing to make decisions about children of any age.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

CONTROLLER

We are a 'controller' for the purposes of the UK General Data Protection Regulation incorporated by the UK's Data Protection Act 2018 (collectively referred to as the "**Data Protection Laws**"). We take your privacy very seriously. We ask that you read this privacy notice carefully as it contains important information about our processing and your rights.

Commonwealth Games Wales has appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data protection officer using the details set out below.

CONTACT DETAILS

Our full details are: Commonwealth Games Wales

DPO: Mrs Rebecca Edwards-Symmons, Chief Executive.

Email address: redwardssymmons@teamwales.cymru

Postal address: Commonwealth Games Wales, National Indoor Athletics Centre, Cyncoed Road, Cardiff CF23 6XD

If you do not think that we have processed your data in accordance with this Privacy Notice, you should let us know as soon as possible. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

CHANGES TO THE PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

We keep our privacy policy under regular review.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. THE DATA WE COLLECT ABOUT YOU

We will be processing personal information for multiple reasons in order to manage Team Wales at the 2023 Commonwealth Youth games ("Games") which will be held in Trinidad and Tobago. In order to effectively manage Team Wales, we will collect the data set out below.

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

For the purposes of our relationship with you, we may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

Personal details including name, date of birth, identity and contact information.

Family and lifestyle details.

Financial details.

Payment details.

Identity data.

Sponsorship details.

Performance data – Medical information.

Anti-Doping data.

Clothing sizes and measurements.

We may also collect **Special Categories of Personal Data** about you ((this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of our agreements with you or on your behalf and you fail to provide that data when requested, we may not be able to perform the agreement we have with you.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct interactions. You may provide us with your personal data by meeting with us in person, by corresponding with us by post, phone, e-mail or otherwise (such as direct input into the Plus 1% database).

Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:

Press reports and social media;

Sponsors;

National Governing Bodies;

Team Managers and Coaches;

The Commonwealth Games Federation / Organising Committee;

UK anti-doping;

Your medical professionals.

Commonwealth Games Wales has access to the Plus 1% database. This database is owned by Association of Multisports Organisations (AMO) and is hosted outside the UK.

We will have access to any data you add to this database. That information is shared with Commonwealth Games Wales pursuant to the explicit consent of the team members and also pursuant to their legitimate and contractual interests.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests;
- Where we need to comply with a legal obligation;
- to facilitate our selection processes;
- to facilitate your participation in any games or competitions;

- to carry out our obligations arising from any contracts / agreements entered into and to provide you with the information, products and services that you request from us;
- to notify you about changes;
- to generate statistics;
- for marketing and press relations;
- to obtain kit and sponsorship;
- to promote Commonwealth Games Wales;
- to comply with all regulatory requirements placed upon us such as anti-doping rules;
- Supporting network and system security;
- Detecting and preventing fraud;
- In your legitimate interests and ours where appropriate;

For special categories of data, we will use your data in the following circumstances; -

- Your explicit consent by virtue of any contract signed by you.
- To protect your vital interests.

Other than for special categories of data, we do not generally rely on consent as a legal basis for processing your personal data other than in relation to sending any marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To facilitate your participation / involvement in any games / competitions or selections	(a) Identity (b) Contact (c) Health	Performance of a contract In your legitimate interests to facilitate your participation. With your consent / explicit consent Necessary to comply with a legal obligation

For marketing, sponsorship and press relations	(a) Identity (b) Biography details (c) Social media handles / profiles/ Clothing sizes and measurements (d) Marketing and Promotions	Performance of a contract In your legitimate interests to raise your profile and that of the team / Commonwealth Games Wales.
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review / complete a questionnaire (c) To provide you with marketing materials and event notifications.	(a) Identity (b) Contact (c) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal Obligation (c) Necessary for our legitimate interests (to keep our records updated) (d) Consent for e-mail marketing

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- Medics such as doctors and physiotherapists;
- Team managers;
- National Governing Bodies;
- UK Anti-doping;
- Foreign Governments for the purposes of visa and immigration requirements;
- The Commonwealth Games Federation / Organising Committee;

- The press / media outlets;
- Profile writers and translators;

- Kit sponsors or suppliers;
- Professional advisors, such as lawyers and consultants.
- UK Government bodies or officials.
- Third-party service providers, such as providers of:
 - IT system management;
 - information security;

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

Whenever we transfer your personal data out of the UK and the European Economic Area (“EEA”), we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented;

We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data.

Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by contacting us.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

As a data subject, you have the following legal rights under the Data Protection Laws in relation to your personal data. You can exercise these rights free of charge, by contacting our data protection officer. We will respond to any rights that you exercise within a month of receiving the request unless the request is particularly complex, in which case we will respond within three months.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Please be aware that there are exceptions and exemptions that apply to some of these rights, which we will apply in accordance with the Data Protection Laws.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

Right to be informed.

Request access to your personal data.

Request correction of your personal data.

Request erasure of your personal data.

Object to processing of your personal data.

Request restriction of processing your personal data.

Request transfer of your personal data.

Right to withdraw consent.

10. GLOSSARY

Legitimate Interest means the interest of our practice in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide services to you. We will advise you if this is the case at the time you withdraw your consent.