



## **Exeter Chiefs Academy Privacy Policy**

This document describes how Exeter Chiefs Academy collects and processes personal data in relation to our players and their parents/guardians including our use of the Game Management System (GMS) provided by the Rugby Football Union (RFU) and Hudl.

This notice also describes your data protection rights, including a right to object to some of the processing which we carry out.

Please also read the Exeter Rugby Club Privacy Policy located on the Exeter Rugby Club website [www.exeterchiefs.co.uk](http://www.exeterchiefs.co.uk)

### **Our Commitment to Data Security**

Exeter Chiefs Academy takes its responsibilities around safeguarding personal data very seriously and will take great care to ensure that your personal data is handled appropriately in order to secure and maintain your trust and confidence in the Club.

Exeter Rugby Club's Data Controller is registered with the Information Commissioner. This person ensures that Exeter Chiefs Academy handles all personal data in accordance with the regulations.

To contact the Data Controller please write to:

Mark Isaacs  
Data Protection Officer  
Exeter Rugby Club  
Sandy Park Stadium  
Sandy Park Way  
Exeter  
EX2 7NN

### **What personal data do we collect?**

When participating in any Academy activity the personal information we collect from you is kept to a minimum but is sensitive and special in nature.

We collect and process personal data from you and/or your parent/guardian when you join. We also collect and process your personal information to enable us to manage both the playing and social functions of the Club and on occasion to promote the benefits that may be of interest to you.

This includes:

- your name
- your gender
- your date of birth
- your place of birth
- your RFU ID (as assigned in GMS)
- your home address, email address and phone number
- your passport and NI details, where we have to check your eligibility or ability to work for us
- your type of membership and involvement in particular teams, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Coach etc
- your payment and/or bank account details, where you provide these to make any payment
- your medical conditions, medical history or disability, where you provide this to us with your consent (or your parent/guardian's consent) to ensure we are aware of any support we may need to provide to you
- your school profile (name of school, subjects taken, career aspirations etc)
- your rugby profile (position, current rugby club etc)
- your emergency contact and/or parent/guardian's name, email and mobile number

Some information will be generated as part of your involvement with us, in particular data about your performance, involvement in particular matches in match reports and details of any disciplinary issues or incidents you may be involved in on and off the pitch, such as within health and safety records.

### **Our legal basis for using your personal information**

The UK GDPR, (Our Global standard of compliance) requires that a Controller must have a legal basis for processing personal data. In most instances, our legal bases for processing your personal data are:

- a. Your consent.
- a. We have a contractual obligation.
- a. We have a legal obligation.
- a. We have a vital interest.
- a. We need it to perform a public task.
- a. We have a legitimate interest.

### **Platforms Used**

The Club utilise Microsoft Office, Hudl, GMS and Team Manager Pro in order to manage administrative tasks. All of these platform's help automate many common admin tasks that when done manually could risk a data breach. They are GDPR compliant in design. Their individual Privacy Policies can be viewed on their websites.

We may also utilise specialist software applications to elevate performance through video and analytics.

### **What information do we receive from third parties?**

Sometimes, we receive information about you from third parties. For example, if you are a child, we may be given information about you by your parents.

We may receive information relating to your involvement with other clubs, rugby bodies or disciplinary history from the RFU.

Additionally, for certain role holders or those working with children, we may receive information from the Disclosure and Barring Service and RFU on the status of any DBS check you have been required to take.

We may also receive information from Devon RFU or Cornwall RFU for the purposes of administering rugby across the counties and from local authorities and the Police for the purposes of safeguarding children and young people.

### **How do we process your personal information, and what is the legal basis for such use?**

We are a rugby club with a men's senior section playing in the Premiership and women's section playing in the Premier 15s. The Academy has approximately 500 children in its various programmes. We rely on and have been successful in fast-tracking our home-grown talent into our representative sides and want to continue to improve that record.

We use your personal data to pursue our legitimate interests, specifically:

- To manage and administer your involvement with our teams and wider club, and to keep in contact with you for these purposes.
- We also use your personal data to administer a contract, or take steps linked to a contract.
- We will also use data to maintain records of our performances and history, including match reports, score lines and team sheets.
- To further publicise both playing and social events through the occasional use of images.
- We will also process personal data to meet our legal obligations.

- We will maintain records such as health and safety records and accounting records in order to meet specific legal requirements.
- We will ensure that if you work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.
- Where you hold a role at the Club requiring us to check your right to work, we may process information to meet our employment obligations.
- We may respond to requests by government or law enforcement authorities conducting an investigation.

Our website is used to promote the Club.

### **Who do we share your information with?**

Some limited information may be shared with other stakeholders in rugby, such as the Rugby Football Union (RFU), other clubs, Constituent Bodies (Devon RFU and Cornwall RFU), referee societies, league organisers, so that they can regulate, develop, maintain appropriate records and assist us in organising matches and administering the game.

Further details of the use of data by the RFU, DRFU and CRFU can be found in their respective privacy statements.

We may share your data with third parties (a) if we are under a legal or regulatory duty to do so, (b) if it is necessary to do so to enforce our terms and conditions of sale or other contractual rights, (c) to lawfully assist the police or security services with the prevention and detection of crime or terrorist activity, (d) where such disclosure is necessary to protect the safety or security of any persons, and/or (e) otherwise as permitted under applicable law.

Where you work in a particular role within the game, you may be required to undergo a Disclosure & Barring Service check using the RFU's DBS system. The result of this check will be input into your Game Management Service (GMS) record.

### **The period for which we will keep your information**

We will retain your personal information for the period of your time in the pathway, if you leave your information will be removed from our databases and other files after the player has reached 24 years.

### **Your Rights**

You have rights under the data protection legislation and, subject to certain legal exemptions, we must comply when you inform us that you wish to exercise these rights. There is no charge, unless your requests are manifestly unfounded or excessive. In such circumstances, we may make a reasonable charge or decline to act on your request. Before we action your request, we may ask you for proof of your identity. Once in receipt of this, we will process the request without undue delay and within one month. In order to exercise your rights please contact our Data Protection Officer at **markisaacs@exeterchiefs.co.uk**

Where we rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time. You can exercise these rights by contacting the Club at the address shown above ideally in writing or by email, we may require further proof of your identity before acting upon your request. We also respect your right to withdraw your consent for us to process your personal data at any time. Should you wish to exercise this right we will remove your personal data from our database as soon as possible.

You also have the right to complain to the regulatory body for the UK, the Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF [www.ico.org.uk](http://www.ico.org.uk) if you are unhappy with the way in which your personal information has been or is being processed.

### **Data security**

To secure personal information on platforms used, access to your data is password protected and access is restricted and controlled.

### **Planning for a personal data breach**

- We know how to recognise a personal data breach.
- We understand that a personal data breach isn't only about loss or theft of personal data.
- We have prepared a response plan for addressing any personal data breaches that occur.
- We have allocated responsibility for managing breaches to a dedicated person or team.
- Our staff know how to escalate a security incident to the appropriate person or team in our organisation to determine whether a breach has occurred.

### **How we respond to a personal data breach**

- We have in place a process to assess the likely risk to individuals as a result of a breach.
- We have a process to inform affected individuals about a breach when their rights and freedoms are at high risk.
- We know we must inform affected individuals without undue delay.
- We know who is the relevant supervisory authority for our processing activities.
- We have a process to notify the ICO of a breach within 72 hours of becoming aware of it, even if we do not have all the details yet.
- We know what information we must give the ICO about a breach.
- We know what information about a breach we must provide to individuals, and that we should provide advice to help them protect themselves from its effects.
- We document all breaches, even if they don't all need to be reported.

### **Changes to the Exeter Chiefs Academy Privacy Policy**

Any changes we make to our privacy policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our privacy policy.

**Last updated: July 2022**