



PROUDLY SPONSORED BY **TRAILFINDERS**
THE TRAVEL EXPERTS 

EALING TRAILFINDERS RUGBY CLUB

Ealing Trailfinders Professional Rugby Management Privacy Policy & Cookies Policy

Ealing Trailfinders Professional Rugby Management Ltd with registered address at 23 Abingdon Road, London, W8 6AH (also referred to as “the Club”, “we” or “us”) is committed to protecting and respecting your privacy. We are the data controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/279) and any other law applicable to the processing of your personal data. We will take all necessary steps to ensure that your personal data is processed by us in accordance with these data protection laws.

This policy describes how ETPRM (also referred to as “the Club”, “we” or “us”) will make use of the data we handle in relation to our staff, including players and other employees and consultants, including our use of the Game Management System (“GMS”) provided by the Rugby Football Union (“RFU”). The policy also describes the RFU’s use of data on GMS.

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to: Ealing Trailfinders, Vallis Way, W13 0DD, London or email lindsey@etprm.com

Summary of how ETPRM and the RFU use your data

- uses your personal data to manage and administer your involvement with the club and to keep in contact with you for these purposes
- Some data is shared with the RFU, who use your data to regulate, develop and manage the game.
- Where we or the RFU rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time.

- We may use your data, including photos, in publications and social media such as the match day programme, the website, Twitter and other media to support us promoting the club and rugby.

What information do we collect?

We collect and process personal data from you when you join and when we carry out annual renewals of your membership. This includes:

- your name
- your gender,
- your date of birth,
- your RFU ID (as assigned in GMS)
- name, address, phone numbers - for the employee and next of kin
- your type of membership and involvement in particular teams,
- your medical conditions or disability, where you provide this to us with your consent (or your parent's consent) to ensure we are aware of any support we may need to provide to you.

What information do we receive from third parties?

We may receive information relating to your existing registrations with other clubs or rugby bodies or disciplinary history from the RFU through GMS. 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.

How do we use this information, and what is the legal basis for this use?

We process this personal data for the following purposes:

- To fulfill a contract, or take steps linked to a contract: This includes:
 - communicating with you;
 - to support and enable you to work with us
- As required by the Club to conduct our business and pursue our legitimate interests, in particular to:
 - manage and administer your involvement with its teams and club, and to keep in contact with you for these purposes;
 - we use CCTV cameras to maintain the security of our premises and may use this video to investigate incidents at the Club or its premises
- Where you give us consent:
 - we will send you direct marketing or promotional material by email;

- o on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.
- For purposes which are required by law:
 - o we maintain records such as health and safety records and accounting records in order to meet specific legal requirements;
 - o we ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent.

How does the RFU use any of my information?

The RFU provides GMS, but make its own use of the following information:

- your name;
- your gender;
- your date of birth;
- your RFU ID (as assigned in GMS);
- your home address, email address and phone number; and
- your type of membership and involvement in particular teams at the Club, or any key role you may have been allocated, such as Chair, Safeguarding Lead, Membership Secretary etc.

The RFU uses this information as follows:

- As required by the RFU to conduct its business and pursue its legitimate interests, in particular:
 - o communicating with you or about you where necessary to administer Rugby in England, including responding to any questions you send to the RFU about GMS;
 - o administering and ensuring the eligibility of players, match officials and others involved in English rugby – this may involve the receipt of limited amounts of sensitive data in relation to disabled players, where they are registered for a disabled league or team, or in relation to anti-doping matters;
 - o maintaining records of the game as played in England, in particular maintaining details of discipline and misconduct;
 - o monitoring use of GMS, and using this to help it, monitor, improve and protect its content and services and investigate any complaints received from you or from others about GMS;

- o maintaining statistics and conducting analysis on the make-up of rugby's participants;
 - o ensuring compliance with the current RFU Rules and Regulations including those on the affiliation of clubs, referee societies, constituent bodies and other rugby bodies, and registration of players; and
 - o communicating with you to ask for your opinion on RFU initiatives.
- For purposes which are required by law:
 - o The RFU will ensure, where you will work with children and where this is required, that you have undergone an appropriate DBS check – this is also carried out with your consent.
 - o The RFU may respond to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below in the “**How do I get in touch with you or the RFU?**” section.

Who will we share this data with, where and when?

Some limited information may be shared with other stakeholders in rugby, such as other clubs, Constituent Bodies, referee societies, league organisers, so that they can maintain appropriate records and assist us in organising matches and administering the game.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our or the RFU's legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. Such third parties include the RFU as the provider of GMS

What rights do I have?

You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format.

In addition, you can object to the processing of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example, if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on GMS.

To exercise any of these rights, you can get in touch with us— or, as appropriate, the RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional, particularly information such as your medical information. If this is not provided, we may not be able to provide you with appropriate assistance, services or support.

How do I get in touch with ETPRM or the RFU?

We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data or would like to opt out of direct marketing, you can get in touch at lindsey.cottrell@etprm.com or by writing to Lindsey Cottrell, HR Manager, ETPRM, Trailfinders Sports Club, Vallis Way, W13 0DD. If you have any concerns about how the RFU process your data, you can get in touch at legal@rfu.com or by writing to The Data Protection Officer, Rugby Football Union, Twickenham Stadium, 200 Whitton Road, Twickenham TW2 7BA.

How long will you retain my data?

We process the majority of your data for as long as you are an active member and for 2 years after this.

Where we process personal data for marketing purposes or with your consent, we process the data for 2 years unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

ETRPM processes personal data and will keep the data for 2 years from your last interaction. We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

The RFU will maintain records of individuals who have registered on GMS, records of DBS checks and the resulting outcomes and other disciplinary matters for such period as is set out in the RFU's privacy notice to be set out on www.englandrugby.com.

Records of your involvement in a particular match, on team sheets, on results pages or in match reports may be held indefinitely both by us and the RFU in order to maintain a record of the game.

Cookies Policy

A cookie consists of information sent by a web server to a web browser, and stored by the browser. The information is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser.

We may use both “session” cookies and “persistent” cookies on the website. We will use the session cookies to: keep track of you whilst you navigate the website. We will use the persistent cookies to: enable our website to recognise you when you visit.

Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date.

We use Google Analytics to analyse the use of this website. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated relating to our website is used to create reports about the use of the website. Google will store this information. Google's privacy policy is available at: <http://www.google.com/privacypolicy.html>

Most browsers allow you to reject all cookies, whilst some browsers allow you to reject just third party cookies. For example, in Internet Explorer you can refuse all cookies by clicking “Tools”, “Internet Options”, “Privacy”, and selecting “Block all cookies” using the sliding selector. Blocking all cookies will, however, have a negative impact upon the usability of many websites[, including this one].