

## Privacy Policy

### Introduction

Sport Structures (“we”, “our”, “us”) are committed to respecting your privacy. We would encourage you to read this policy carefully to understand how we will gather and use the personal information we collect from you. It applies to information collected by us or provided by you when using our website, as well as in other circumstances when we collect data from you (including via email). It is intended to assist you in making informed decisions when using our website and products and services.

This policy applies to you if you are:

- An employee or associate of Sport Structures
- A coach, volunteer, teacher, official or a coach educator who has registered to attend an education course, workshop or qualification;
- A customer who has contacted us to find out more about our training courses, apprenticeships and education services we offer;
- An individual representing an organisation who has contacted us to find out about our cross-company products and services; or a customer who has contacted us to find out more about our training courses,
- An individual participating in a project that we manage or have some involvement in.
- An apprentice.
- A learner who has registered to attend an education course.

### Controller

The Sport Structures brand covers two companies.

Sport Structures Limited  
Company number: 4492940  
VAT number: 783 9346 80

Sport Structures Education CIC  
Company number: 6591600  
VAT number: 915 2882 15.

The Sport Structures brand is the controller of your information for the purposes of the GDPR.

### Contact details

Colin Geenes is our Lead Officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this policy, including any request to exercise your legal rights, please contact us using the details below:

Lead Officer
Colin Geenes Mobile: 07917 388169 Email: <a href="mailto:Colin.Geenes@sportstructures.com">Colin.Geenes@sportstructures.com</a>

You have the right to make a complaint at any time to the Information Commissioner's Office (**ICO**), the supervisory authority for data protection issues in the UK (phone: 0303 123 1113 or at [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)). However, we would appreciate the chance to deal with your concerns before you approach the ICO, so please feel free to contact us in the first instance.

### [Changes to this Privacy Policy and changes to your details](#)

We will need to update this Privacy Policy from time to time as the law and/or our organisation changes and develops. If changes are made to the policy, we will update the version date at the top of this page.

We will endeavour to tell you in advance by sending a message to you if we hold your email address. If you continue to use our websites and/or services after we have changed our privacy notice, we will take this as an indication that you accept the changes.

### [Third-party links](#)

Our website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website, plug-in and/or application that you visit.

### [Personal information we may collect from you](#)

When you are employed, or otherwise engaged with Sport Structures you may provide us with, or we may obtain personal information about you, such as information regarding your:

- Personal details (i.e., name, title, address, email addresses, telephone numbers, date of birth, gender, emergency contact name and number).
- Competency or skills test results.
- Attendance.
- Records of interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
- Bank 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 website portal, usernames and other IT system identifying information.
- Images in video and/or photographic form and voice recordings.
- Marketing preferences so that we know whether and how we should contact you.
- Employment data i.e. salary, annual leave, sickness absence details, bank details;
- Recruitment information i.e. information provided on the application and CV;
- Evidence of relevant qualifications, memberships and accreditations;
- Records of interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;

- Use of and movements through our website portal, user names and other IT system-identifying information;
- Records of your attendance at any courses or events hosted by us;

### Sensitive data

In certain situations, we have to collect sensitive data about you. Under data protection law this is known as "special category" data and includes details about:

- Right to Work in the UK.
- Identification documents such as passport, utility bills, driving license etc.
- Your health, including any disabilities or medical conditions or factors which may affect participation/performance.
- Participation / Performance.
- Ethnicity.

We will not collect all of the above types of sensitive data about you in all circumstances. We will only collect specific data when there is a legitimate business reason to do so for example in the following situations:

- Employment with Sport Structures
- If you are registered to become part of our coach educator workforce
- As part of an education course.
- Qualification registration.

### Where we collect your information

We typically collect personal information about you through direct interactions: you may give us your personal information when you apply for a job, or sign up for one of our products or services via our website at [www.sportstructures.com](http://www.sportstructures.com) or via phone, post, email, social media or otherwise. Alternatively, this may be given if you make an enquiry/complaint or when you correspond with us via phone, email or via other technological mechanisms.

If you are providing us with details of referees, next of kin, family members and emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use and may share that information. We would encourage you to share this Privacy Policy as appropriate.

### How do we use your personal data?

We only use your personal data when allowed to do so by law. Please note that you have the right to withdraw your consent at any time by [contacting us](#) or unsubscribing to our messages.

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.

The table on the following pages describes the main purposes for which we process your personal information. Please contact us if you would like further information about the specific basis for processing.

Activity	Personal data	Basis for processing
<p>To process and deliver a product or service that you have requested from us, including:</p> <ul style="list-style-type: none"> <li>-Registering for a course or educational programme or purchasing a product via our website</li> <li>-issuing a refund</li> <li>-to manage the payment, fees, and charges</li> <li>-to collect and recover money owed to us</li> <li>-any other contractual arrangement that we agree to enter with you.</li> </ul>	<p>Personal contact details, personal details, transaction, and payment data.</p> <p>Details of your affiliated club/organisation, identification documents, coaching history, and evidence of qualifications.</p>	<p>Performance of a contract with you.</p> <p>Necessary for our legitimate interests.</p>
<p>To tailor our direct marketing to you and to send you direct marketing communications including via:</p> <ul style="list-style-type: none"> <li>-Email</li> <li>-SMS</li> </ul>	<p>Personal contact and personal details.</p>	<p>In terms of tailoring our direct marketing, necessary for our legitimate interests, being able to develop our business and inform our marketing and communications.</p> <p>In terms of sending direct marketing where you are a customer and have not previously opted out of receiving such direct marketing, as necessary for our legitimate interests, being able to offer you relevant products and services related to what we have previously provided to you.</p>
<p>To enable you to take part in prize draws, competitions, or surveys</p>	<p>Personal contact and personal details</p>	<p>Performance of a contract with you.</p> <p>Necessary for our legitimate interests, being able to study how customers use our products and services, to</p>

Activity	Personal data	Basis for processing
		develop them and grow our business.
<p>To manage our relationship with you, which includes:</p> <ul style="list-style-type: none"> <li>-to notify you about changes to our Privacy Policy</li> <li>-to communicate with you about changes to our product and services, websites and other services and activities from time to time</li> <li>-to respond to, deal with and address any questions, suggestions, issues, or complaints you have raised</li> <li>-to respond to any social media reviews, posts, or other public comments you make about us, our brands, website, services or other activities.</li> </ul>		<p>Performance of a contract with you.</p> <p>Necessary to comply with a legal obligation.</p> <p>Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).</p>

### Marketing to you

We may contact you by email, post, 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 emailing us at [Colin.Geenes@sportstructures.com](mailto:Colin.Geenes@sportstructures.com). You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

### How we share your personal data

We cannot provide many of the services and benefits identified above without involving other people and organisations. We only share your information in accordance with the laws applicable to us and for the purposes set out in the table.

We share personal information with the following parties:

- Any party approved by you.
- To national governing bodies or regional bodies for the sports offered in our products and services.
- To awarding bodies or end point assessment organisations (i.e., 1<sup>st</sup>4Sport qualifications, City and Guilds).

- To other service providers (i.e., email marketing specialists, payment processors and IT services (including website, CRM).
- The Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives.
- Any funding providers or partners in a programme.

#### How we keep your personal data secure

We take the security of your personal data very seriously and always have in place appropriate security measures, including where we share your information with our suppliers and partners, to protect your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have also 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.

#### Transferring personal data internationally

Data transfers under the GDPR refer to the act of facilitating the access or movement of personal data to a "third country," which denotes any destination lacking legislation comparable to the GDPR for safeguarding individuals' rights. Prior to initiating such transfers, we will conduct a [Data Transfer Impact Assessments \(DTIA\)](#) – see Figure 1. This is essential to ensure data subjects' rights in recipient countries align with GDPR standards, especially crucial for transfers to uncertain third countries. Even with contracts, destination country stability and legislation may pose risks. While not mandatory for adequacy-decision countries, best practice includes a quick DTIA. Binding corporate rules can legitimize transfers to third-country subsidiaries but require audit and approval. Relief from DTIA exists with safeguards like consent or contract performance, but cautious application is needed.

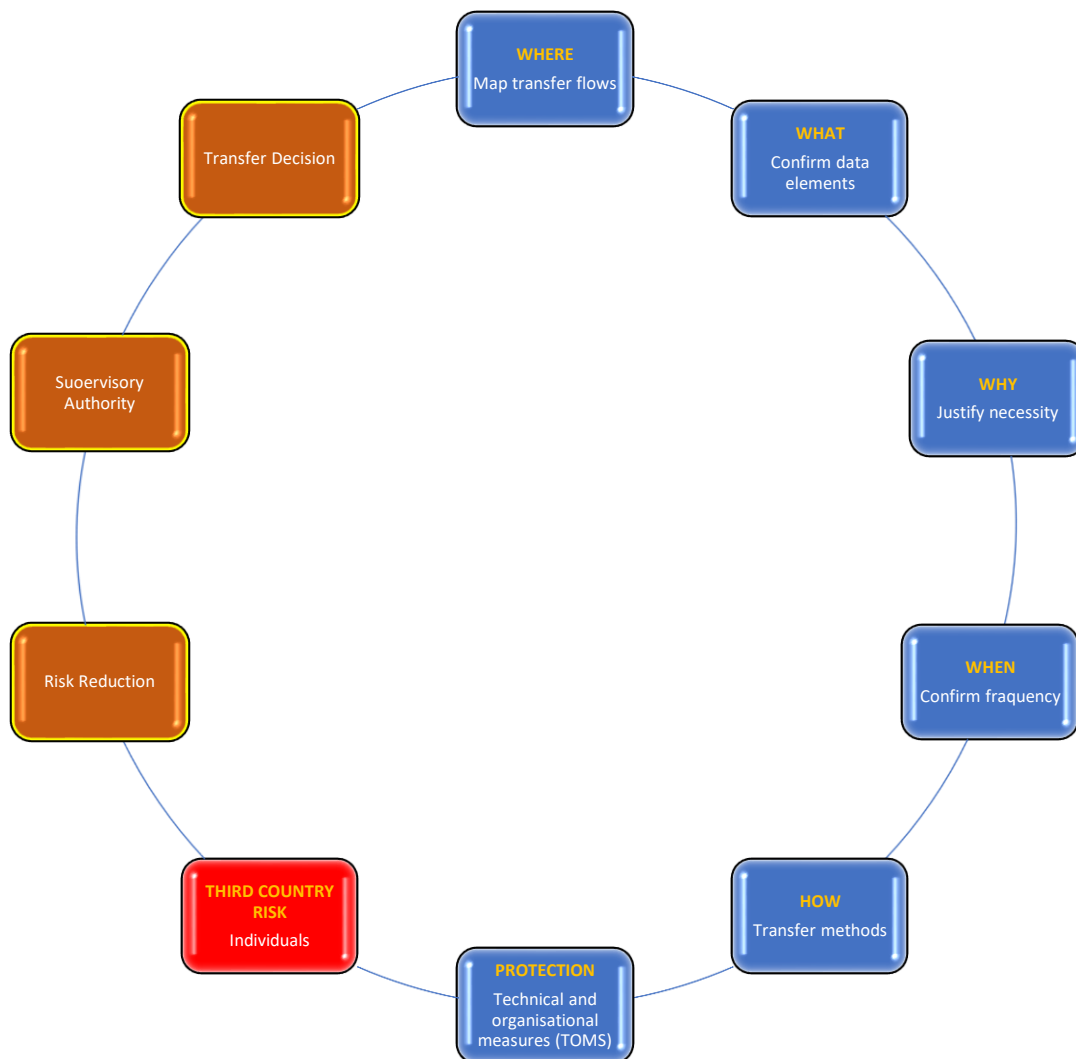


Figure 1.

At Sport Structures, we are dedicated to upholding the Schrems II ruling obligations outlined by the Court of Justice of the EU (CJEU) and where we allow an organisation to process your personal information outside of the UK, any transfers made will be in full compliance with all aspects of applicable privacy and data protection law. As per the ruling, it is imperative that we undertake robust due diligence procedures when transferring personal data outside of the European Economic Area (EEA) to ensure compliance with UK and EU data protection laws. Our policy emphasises adherence to the [General Data Protection Regulation \(GDPR\)](#) requirements, particularly [Chapter V](#), which sets forth restrictions on international data transfers.

We acknowledge the necessity of conducting [Data Transfer Impact Assessments \(DTIAs\)](#) to evaluate the laws and practices of third countries and identify supplementary measures to ensure an equivalent level of protection to that provided by the GDPR. Additionally, we commit to utilising appropriate safeguards such as standard contractual clauses (SCCs) provided by the UK Information Commissioner's Office (ICO) or the [International Data Transfer Agreement \(IDTA\)](#) to govern data transfers to countries without adequacy decisions. By implementing these measures and staying informed about developments in UK data protection law, we strive to uphold the highest standards of data protection and ensure the

privacy and security of personal data entrusted to us by our customers, partners, and stakeholders.

The International Data Transfer Agreement (IDTA) outlines several obligations for both the Exporter and the Importer to ensure the appropriate safeguards are in place for transferred data.

**For the Exporter:**

1. Comply with UK Data Protection Laws in transferring the data and linked agreements.
2. Conduct reasonable checks on the Importer's ability to comply with the IDTA.
3. Co-operate with the Importer in passing on notices or information to Relevant Data Subjects or Third-Party Controllers.
4. Provide reasonable assistance to the Importer in complying with obligations to Relevant Data Subjects and local laws.

**For the Importer:**

1. Process the transferred data only for the specified purpose.
2. Comply with all obligations outlined in the IDTA and linked agreements.
3. Maintain written records of data processing activities and provide them upon request.
4. Co-operate with the Exporter and any Third-Party Controller to ensure compliance with UK Data Protection Laws and the IDTA.
5. Notify the Exporter without undue delay in the event of a personal data breach and take steps to rectify and prevent it.
6. If applicable, notify Relevant Data Subjects of a breach and provide necessary information.
7. Keep the Exporter informed of any changes to contact details for Relevant Data Subjects.
8. Ensure that Relevant Data Subjects have access to information about the Importer's processing activities.

*Schrems II compliance solution (Figure 2):*

- Due diligence: Identify data transfer mechanisms, countries involved and impacted contracts.
- Risk assessment: Identify high risk contracts and action required and identify supplementary measures and additional controls for data transfer.
- Contract analysis: Updates/Supplements to existing Data Processing Agreements (DPAs) or Data Transfer Agreements (DTAs) with data transfer mechanisms aligned to Schrems II.
- Contract negotiation: New SCCs executed and complaint to Schrems II guidelines.

Sport Structures will conduct risk assessment of laws of the destination countries as provided by Schrems II and implement the new SCCs, wherever required, before transferring personal data to third countries. Sport Structures will ensure that all internal and external stakeholders are aligned to the highly regulated confines of Schrems II. Then we will re-assess all the data transfers undertaken and invest in precise due diligence of data privacy laws of importing countries.



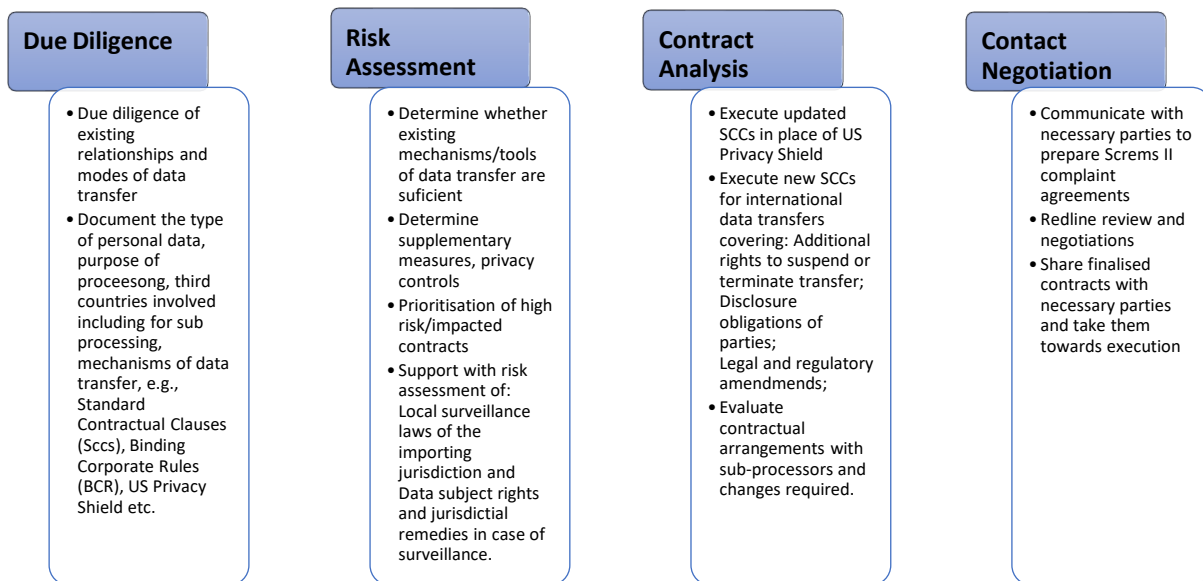


Figure 2. Schrems II compliance Implementation plan

### IP addresses and cookies

As you interact with our website and our services, we may automatically collect technical data about your equipment, browsing actions and patterns. This data about our user's browsing actions and patterns does not identify any individual.

We collect this personal data by using [cookies](#) (which are stored on the hard drive of your computer) and other similar technologies. We may also receive technical data about you if you visit other websites employing our cookies.

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting, you may limit your access to certain parts of our website.

### Retaining your personal data

We can only keep your personal data for as long as necessary and for the purposes we are collecting it for, including for the purposes of satisfying any legal, accounting, auditing, or reporting requirements.

The precise length of time we hold your personal data varies depending on the individual circumstances, but in determining 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.

We regularly review our retention periods to ensure that we are not keeping your data for longer than necessary. Details of retention periods for different aspects of your personal data are available by [contacting us](#).

### Your rights

In certain circumstances, you may have the right to request access, transfer, rectification and/or erasure of the personal data that we process about you. You may also have the right to object to and/or restrict our processing of your personal data. Details of the rights are set out below.

- **Human intervention:** you may request human intervention where a decision has been made about you based solely on automated processing, and/or you may challenge that decision (this may happen in the context of our recruitment process where we collect information relating to whether a candidate has unspent criminal convictions).
- **Access:** you may request access to your personal data, which enables you to receive a copy of the personal data that we hold about you and to check to see if we are processing it lawfully.
- **Transfer:** you may request that we transfer your personal data to you or 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. Please 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.
- **Rectification:** you may request rectification 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.
- **Erasure:** you may request the erasure of the personal data that we hold about you. 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:** you may object to how we are processing 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.
- **Restriction:** you may request that we restrict how we process 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

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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 to override legitimate grounds to use it.

- **Withdrawal of consent:** where we have relied on your consent to process your personal data you will have the right to withdraw your consent at any time. 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 certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Right to Be Forgotten:** Individuals have the right to request the erasure of their personal data under certain circumstances. This enables them to have their data deleted if it's no longer necessary for the purpose for which it was collected or if they withdraw their consent.

To exercise any of these rights please contact us via the information provided on page 1. If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

The ICO regulates UK data and information laws. To learn more about your rights, visit the ICO website at [www.ico.org.uk](http://www.ico.org.uk)