

MANX HOCKEY ASSOCIATION
PRIVACY NOTICE FOR VOLUNTEERS

Background (the legal bit)

The Manx Hockey Association is registered with the Isle of Man Information Commissioner and therefore operates under the Isle of Man Data Protection Act (2018).

This privacy notice is intended to make the individual whose data you are processing aware of how their personal data is being used and what personal data relating to them is being processed. The obligation to provide a privacy notice only applies to data controllers and there is no requirement to provide one if you are only a data processor in relation to the relevant personal data. However, please note that it is possible to be both a data controller and a data processor in relation to the same personal data, so whether an organisation is a data controller or data processor for any particular processing activity will require careful consideration. A data controller is defined as 'a natural or legal person, public authority, agency or other body, which, alone or jointly with others, determines the purposes and means of the processing of personal data' whereas a data processor is defined as 'a natural or legal person, public authority, agency or other body which processes personal data on behalf of the data controller'.

So a data controller is the person that controls how the data is used and processed. For example, an employer will always be a data controller of personal data relating to its employees. A data processor is a person who processes the personal data in accordance with the instructions of the data controller. They are usually a supplier to the data controller, but not all suppliers are data processors. For example, an outsourced payroll provider will be a data processor, as they will process the payroll information they are provided with by the employer strictly in accordance with the instructions of the data controller. However, a health insurance provider providing health insurance to the employer's employees would be a data controller because, although they are supplying a product to the employees of the employer, they will decide how they use and process the personal data they are provided with in order to provide the insurance product.

Essentially the Manx Hockey Association will always be the data controller of the personal data relating to its members, its representatives and its staff/employees but, occasionally, if say it is giving presentations for or arranging workshops or training sessions on behalf of other organisations, it might only be a data processor of the personal data of the attendees/participants.

General

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your relationship with us a volunteer. This notice applies to current and former volunteers and this notice is not a contract of employment or other contract to provide services. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information

References to **we**, **our** or **us** in this privacy notice are to **MANX HOCKEY ASSOCIATION WHO IS THE DATA CONTROLLER**

We have appointed a Data Protection Compliance Officer to oversee our compliance with data protection laws and as such has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION

When you sign up to become a volunteer with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- date of birth;
- gender;
- details of family members and emergency contacts;
- bank account details for payment of any out of pocket expenses;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your volunteering history;
- any identification documents;
- all information included as part of the volunteering application process;

- referee details and any references provided;
- performance including any feedback provided to us by yourself, members of staff or other third parties;
- the location in which you are volunteering;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- images in video and/or photographic form and voice recordings;

2. 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;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and
- biometric information about you, for example fingerprints, retina scans.

We may not collect all of the above types of special category 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.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our volunteers through the application process, directly from you. We may sometimes collect additional information from third parties including former clubs or other organisations you may have volunteered for or via background check agencies. We will also collect additional personal information throughout the period of you volunteering for us and when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way

We also may collect personal information about you from any third party references you provide as part of the application process for becoming a volunteer or from any feedback provided to us about your performance as a volunteer.

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 notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF YOUR PERSONAL INFORMATION

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

<i>Purpose</i>	<i>Personal information used</i>	<i>Lawful basis</i>
Non- ‘special categories’ of Personal Information		
Making a decision about your appointment as a volunteer and managing the appointment process	All the personal information we collect from you as part of the application process. Records of volunteering history.	We need this information to be able to perform and administer your contract with us as a volunteer.

	Referee details and any references.	
To produce and maintain our website and any external marketing campaigns in order to promote volunteer opportunities and to recognise the value created by our volunteers across the sports network	Images in video and/or photographic form and voice recordings	Where you have given us your consent to do so. <i>In line with best practice the MHA will look to obtain consent from you as a volunteer where we intend to use any images or footage of you any promotional campaigns, particularly where there are children involved.</i>
Paying you for any out of pocket expenses	Transaction and payment information.	We need this information to make any out-of-pocket expense payments to you.
Assessing experience for a particular role or task	Records of your volunteering history. All information included as part of the volunteering application process.	We have a legitimate business interest to ensure that our volunteers are suitable for the role.
Complying with health and safety obligations	Movements though CCTV footage & other information obtained through electronic means such as swipecard and key fob records.	We have a legal obligation to comply with Health and Safety laws.
Dealing with legal disputes involving you, or any other volunteers, including accidents	All non-‘special categories’ of personal information	We have a legitimate business interest to ensure that all legal claims are managed effectively. We also have a legal obligation to report any accidents at a workplace in accordance with health and safety laws.
For the purposes of ensuring the security of our systems and information as well as member/customer information	Movements though CCTV footage & other information obtained through electronic means such as swipecard and key fob records. Use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use.	We have a legitimate business interest in ensuring our systems are secure.
To prevent and detect criminal or improper acts	Identification documents	We may have a legal obligation to do so, otherwise we have a legitimate business interest to protect our organisation against criminal or improper acts.
Storage of records relating to you and also records relating to our organisation	All non-‘special categories’ of personal information	We need this information to be able to fulfil our contract with you.
To send you information we think you might find useful or which you have requested from us, including our newsletters, information about volunteering opportunities	Personal contact details such as name, title, email addresses and telephone numbers	Where you have given us your consent to do so.

and other ways of supporting our organisation or the sport, provided you have indicated that you are happy to be contacted for these purposes.		
To arrange and administer your attendance at an event you have volunteered for	Personal contact details. Details of family members and emergency contacts.	This is necessary to enable us to register you on to and properly manage and administer your attendance at the event.
For the purposes of equal opportunities monitoring	Name, title, date of birth; gender, location of volunteering.	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our organisation is offering fair volunteering opportunities to everyone.
To assess your performance as a volunteer	Performance including any feedback provided to us by yourself, members of staff or other third parties.	We have a legitimate interest to ensure your suitability for any future volunteering roles and to ensure that your volunteering experience with us is positive and worthwhile.
'Special categories' of Personal Information and Criminal Records		
Storage of records relating to you and also records relating to our organisation.	All 'special categories' of personal 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 2 above.
For drug and alcohol testing and to assess your suitability for any activities or events we host.	Information about your health, including any medical condition, health and sickness records, medical records and health professional 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 2 above.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to provide appropriate adjustments to our sports facilities.	Information about your health, including any medical condition, health and sickness records, medical records and health professional 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 2 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.

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 volunteer or we may not be able to properly perform our arrangements with you or comply with legal obligations and we may have to terminate your position as a volunteer. 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 arrangements with you as a volunteer.

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 the "**Contacting us**" section 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 benefits to you as a volunteer.

5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party approved by you.**
- **To any international governing bodies or regional bodies for our sports to which our association is affiliated:** to allow them to properly administer the sports on a regional and international level.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.
- Providing references to future employers or organisations you may wish to volunteer for. We do not disclose personal information to anyone else except as set out above.

6. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to and stored in countries outside of the Isle of Man, UK and the European Union.

For further details please contact us by using the details set out in the "**Contacting us**" section below.

7. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

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 (if you are currently volunteering with us, this may be for [6] years after you last volunteered for us). Exceptions to this rule are:

- CCTV records which are held for no more than [30 days] unless we need to preserve the records for the purpose of prevention and detection of crime; and
- Information that may be relevant to personal injury claims may be retained until the limitation period for those types of claims has expired. For personal injury claims this can be an extended period as the limitation period might not start to run until a long time after you have volunteered for us.

8. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

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 notice 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 www.inforights.im

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the Isle of Man Information Commissioner's Office. We are here to help and encourage you to contact us to resolve your complaint first.

9. CHANGES TO THIS NOTICE

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

10. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email mhasecretary@manx.net or write to us at 9 Ashbourne Grove, Saddlestone, Braddan, Isle of Man IM2 1NP.

Version dated May 2018