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# SONCHŌ KARATE CLUB

## PRIVACY POLICY

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This document sets out our approach to handling the personal information that you give the Sonchō Karate Club Community Interest Company when you use this website. It is a living document that will be kept under review and refined in accordance with data protection law and our systems as they evolve. This policy is effective from 1st September 2023.

The fundamental objective of the club is to develop the art, sport, and practice of shotokan karate in Gloucestershire. We are affiliated to HDKI GB (Hombu Dojo Karate International – Great Britain) which is an organisation recognised by the official world governing bodies. The club can be contacted through the website [www.soncho-karate-club.org](http://www.soncho-karate-club.org)

### DATA PROTECTION PRIVACY POLICY

Sonchō Karate Club Community Interest Company (“Sonchō” or “we”) are committed to protecting the privacy and security of our members and visitors to our website. Outlined below is our Data Privacy Policy to explain how we collect, use and share information collected through our website or at our events. If you have questions about these policies, we encourage you to contact us using the details in the “Contacting Us” section below.

This Data Privacy Policy describes how we deal with any personal data you provide to us while visiting our website, [www.soncho-karate-club.org](http://www.soncho-karate-club.org), throughout the course of various interactions by you with Sonchō and during the provision of services to you by Sonchō. By subscribing to our mailing list as a member, availing of services from Sonchō and/or by visiting this website, you are accepting the terms of this Data Privacy Policy. If you have any queries about this policy, you should contact the Sonchō team using the details in the “Contacting Us” section below.

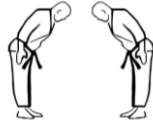
At Sonchō Karate Club Community Interest Company we respect your right to privacy. Any personal data required by Sonchō for the purpose of providing services to you will be held securely and will only be used for the purposes described in this document. Sonchō has never, and will never, sell your data to any 3rd party.

### DEFINITIONS

In this Privacy Policy, the terms below have the following meaning:

“personal data” is as defined in the General Data Protection Regulation (Regulation (EU) 2016/679) (the “GDPR”) and other applicable European and national privacy legislation and regulations (together the “Data Protection Law”), and is information that identifies you as an individual, such as: Name, Postal address, Telephone number, Email address, Emergency contact name and telephone number

“data controller” means the entity which, alone or jointly with others, determines the purposes and means of the processing of personal data.



“data processor” means the party that processes personal data on behalf of the data controller.

“European Economic Area” or “EEA” means Austria, Belgium, Bulgaria, Croatia, Republic of Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, the UK, Iceland, Liechtenstein, and Norway.

“processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction. “process” and “processing” are interpreted accordingly.

“special categories of personal data” are types of personal data that reveal any of the following information relating to an individual: racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. Special categories of personal data also include the processing of genetic data, biometric data, health data, data concerning sex life or sexual orientation and any personal data relating to criminal convictions or offences.

## **COLLECTION OF PERSONAL DATA**

Natalia Bottcher will act as a data controller in respect of personal data collected through our site or during the course of your interactions with us. Collection of personal data by Sonchō arises in various ways:

- Information that you provide to us when registering as a member with Sonchō such as your first name, last name, home address, date of birth, e-mail address and medical disclosure.
- Information that you may provide by availing of our services or registering for training courses and/or attending our events such as first name, last name, home address, e-mail address

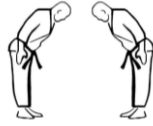
If you contact us for any reason, we may keep a record of that correspondence.

Website visitors can submit enquiries by completing enquiry forms or by submitting email enquiries.

Certain personal information is needed to enable Sonchō to provide certain services to you, e.g. if you are a member we need your email address in order to send you information about our upcoming events. In these circumstances, if an individual does not provide the relevant personal information to Sonchō, Sonchō may not be able to provide its services to the individual. To obtain more information in relation to this, please contact us using the details in the “Contacting Us” section below.

## **RETENTION OF PERSONAL DATA**

Sonchō will retain the information you have provided as long as you remain a member or as long as there is legitimate interest. If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions, we may retain your information for 6 years.



## DISCLOSING PERSONAL DATA

From time to time, Sonchō may disclose personal data to third parties, or allow third parties to access personal data which we process (for example where a law enforcement agency or regulatory authority submits a valid request for access to personal data) and for the purposes of insurance, fraud prevention or investigation. We may also disclose personal data to Sonchō's professional advisors, auditors, technology providers and service providers, such as third parties in connection with the operation and administration of the website.

## INTERNATIONAL TRANSFERS OF PERSONAL DATA

Sonchō will not transfer personal data to countries outside the EEA.

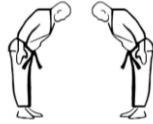
## ACCESSING AND UPDATING YOUR PERSONAL DATA

Sonchō wants to ensure that your data is kept updated, so we do request that changes are notified to us. You have the right to request a copy of the personal data held by us about you and you also have the right to have such data corrected where it is inaccurate. Data Protection Law also provides you with other rights in respect of your personal data, including: the right to erase your personal data (right to be forgotten), the right to restrict processing of your personal data; the right of data portability; the right of objection; and the right to object to any automated decision making. These rights will be exercisable by you subject to limitations as provided for in Data Protection Law. To exercise any of these rights, please contact us using the details in the "Contacting Us" section below. While you may make a complaint in respect of our compliance with Data Protection Law to the British or Irish Data Protection Commission, we request that you contact us in the first instance to give us the opportunity to address any concerns that you may have.

## Use of personal data

The personal data that you provide to us may be processed for the following purposes:

Purpose of processing your personal data	Lawful basis under Data Protection Law
To contact you in response to communications you might send us.	As required for the performance of a contract with you (per Art. 6(1)(b) GDPR) or as is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).
To provide you with the information and services that you have requested.	As required for the performance of a contract with you (per Art. 6(1)(b) GDPR) or as is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).
To provide you with the information and services necessary in the fulfilment of our contractual obligations to you.	As required for the performance of a contract with you (per Art. 6(1)(b) GDPR)
To send you important information regarding Sonchō, your membership, changes to our terms, conditions, and policies and/or other administrative information.	As is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).
To personalise your experience on the Sonchō website.	As is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).



For our internal reporting purposes, such as data analysis, audits, developing new events, enhancing our website and services, improving our services, and identifying usage trends.	As is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).
To comply with legal obligations to which Sonchō is subject.	To comply with legal obligations to which Sonchō is subject (per Art. 6(1)(c) GDPR).
To contact you in relation to our services, events, general news from Sonchō and other communications from HDKI deemed to be of possible interest to you	As is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).

We ask all those who wish to join the club to complete a membership form. This is available on the website which is completed by the applicant or their parents/guardian if under 18yrs. The personal information asked for on the form is limited and commensurate with the safe and efficient running of the club. The information is encrypted when sent to us. We will ask for the following personal information:

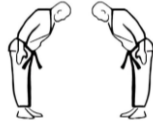
- your name. This is necessary in order to maintain a record of your eligibility to take karate gradings;
- your address. Given that karate is a vigorous martial art, this is necessary to ensure that we can facilitate you getting home safely in the event of injury or other emergency taking place during training sessions;
- your telephone number. This is necessary to efficiently communicate with you regarding club matters you may be interested in including unforeseen cancellation of classes.
- your email address. This is necessary to efficiently communicate with you regarding club matters you may be interested in including unforeseen cancellation of classes.
- emergency contact details (name and telephone number)
- your karate licence details (number and expiry date). This is necessary in order to monitor and ensure continued insurance cover which an up to date licence provides. It is also necessary for completing competition entry forms which requires this information as proof of current HDKI GB membership and insurance cover.

We will ask for the following special category information relating to health:

- pre-existing medical conditions, injuries or limitations to the extent they are relevant or might reasonably be considered relevant to your practice of karate. This is necessary to ensure that you enjoy a healthy and safe regime of training at the clubs and to minimise the risk of injury.

The personal information is used solely for the efficient and safe management of the club. This includes completing competition entry forms on your behalf.

We retain your personal information for the duration of your membership and include a 12 month period of inactivity beyond it to accommodate natural breaks in training. After this period your personal information is archived and the special category information relating to your health erased.



We will not pass on your information to any third parties for any reason unless it be to the HDKI GB for the purpose of gradings, competitions or for some other legitimate purpose connected to your practice of karate, or if we were ordered by a court to do so, or it were for the purposes of a criminal investigation.

Our lawful basis for asking for and using your personal information in the ways set out is that it is necessary to achieve the legitimate interests of the clubs as particularised above. The special category personal information regarding your current state of health is used by us only on the basis of your express consent.

We also celebrate the achievements of our members and promote our activities using photographs of members training and competing in karate. From time to time these may accompany articles in local news journals and on-line on our website and Facebook page. This is done on the basis of your express consent. To contact you in relation to our services, events, general news from Sonchō and other communications from HDKI deemed to be of possible interest to you. As is necessary and proportionate in Sonchō's legitimate interests (per Art. 6(1)(f) GDPR).

## **BROWSER INFORMATION COLLECTED ON OUR WEBSITE**

### **Cookies**

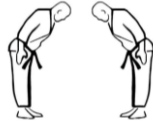
Cookies are files with a small amount of data that is commonly used as an anonymous unique identifier. These are sent to your browser from the website that you visit and are stored on your device internal memory.

If you leave a comment on our site, you may opt-in to saving your name, email address and website in cookies. These are for your convenience so that you do not have to fill in your details again when you leave another comment. These cookies will last for one year.

This Service does not use these "cookies" explicitly. However, our website may use third party code and libraries that use "cookies" to collect information and to improve their services. You have the option to either accept or refuse these cookies and know when a cookie is being sent to your device. If you choose to refuse our cookies, you may not be able to use some portions of this Service.

As with any website operator, Sonchō analyses our website logs to constantly improve the value of our website. We use an external service to provide real-time reporting to us. This reporting includes page views, unique views, unique visitors, repeat visitors, frequency of visits, and peak-volume traffic periods. We do not use this service to gather, request, record, require, collect, or track any Internet users' personally identifiable information.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.



## **SECURITY**

We undertake to hold any personal data provided by you in confidence and in accordance with Data Protection Law. Accordingly, we have technical and organisational measures in place to protect personal data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal data is held securely using a range of security measures including, as appropriate, physical measures, IT measures and restricted access through approvals and passwords.

The GDPR obliges Sonchō acting as data controller to notify the Data Protection Commission and affected data subjects in the case of certain types of personal data security breaches. Any personal data security breaches identified in respect of personal data controlled by Sonchō will be dealt with in accordance with Data Protection Law.

The nature of the internet is such that there is no guarantee or warranty in relation to the security of any information you transmit to us via the Internet. No data transmission over the Internet can be guaranteed to be totally secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the “Contacting Us” section below.

## **LINKS TO EXTERNAL WEBSITES**

Some sections of the Sonchō website provides links to external websites. These are clearly identifiable as such. Such websites are subject to their own privacy policies, and we are not responsible for the content or the privacy policies of these third-party websites.

## **CHANGES TO OUR DATA PRIVACY POLICY**

We may change this Privacy Policy from time to time. Any changes to this Data Privacy Policy will be posted on this website and dated so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it.

## **CONTACTING US**

For further information about this Privacy Policy and/or the processing of your personal data, or to make a complaint or inquiry, please contact us at [info@soncho-karate-club.org](mailto:info@soncho-karate-club.org)

You have a right to request access to the personal information we hold, ask for errors to be rectified or even ask for it to be erased. You also have a right to lodge a complaint with the Information Commissioner [www.ico.org.uk](http://www.ico.org.uk)