Hazlemere Runners

GDPR – Information Privacy Notice

Version History

Version	Description	Date	Author	Approver
V0.1	Previous version as adopted by 2026 Committee	18/07/26	Previous Committees	Previous Committees
V1.0	Changes lawful basis for photo/video marketing use from consent to legitimate interests, with an opt-out set via Coacha; not yet approved	24/10/26	Dan Shawcross	Hazlemere Runners Committee

Next review date: August 2027

Our Contact Details

1. Position: The Club Secretary,
2. Name: Hazlemere Runners
3. Address: C/o Hazlemere Sports Association, Amersham Rd, Hazlemere, High Wycombe HP15 7QA
4. E-mail: hazlemererunners@hotmail.com
5. In the first instance, please contact the Hazlemere Runners by email.

The Type of Personal Information We Collect

6. We currently collect and process the following information:

   a. Personal identifiers and contact details (for example, name and contact details).

   b. Information provided by England Athletics (for example affiliation details, EA qualifications).

   c. Photographs and video footage taken at club training sessions, races and events, where you may be identifiable.

How We Get The Personal Information and Why We Have It

7. Most of the personal information we process is provided to us directly by you for one of the following reasons:

   a. The management of individual or joint membership of Hazlemere Runners.

   b. The management of open to the public races, courses and other events.

   c. The management of members' affiliation to England Athletics.

   d. Members' completion of England Athletics qualifications.

   e. The promotion of Hazlemere Runners' activities through marketing and publicity materials, including the club website, social media channels, and printed materials.

   f. Sharing photographs and video of club activities with members in the club's private Facebook group.

8. We also receive personal information indirectly, from the following sources in the following scenarios:

   a. From England Athletics to manage member affiliation and / or qualification completion and management.

9. We use the information that you have given us in order to manage Hazlemere Runners and individual / joint membership.

10. The information that you have provided will be shared with Coacha, in order to manage club membership, races and organised courses and other events.

11. The information that you have provided will be shared with England Athletics, in order to manage individual / joint membership.

12. The information you have provided (specifically your name and, where applicable, your mobile number) may also be shared with WhatsApp and/or Facebook Messenger, where you choose to join a club WhatsApp group and/or the club's Facebook Messenger group, in order to facilitate club communications. Joining these groups is entirely optional and is not a condition of membership.

12A. Unless you have opted out (see paragraphs 13(b) and 13B below), photographs or video of you taken at club events may be shared publicly via the club's website and social media channels (for example Facebook, Instagram, X), and may occasionally be provided to England Athletics or local press for promotional purposes relating to the club.

12B. Photographs and video taken at club events may also be shared in the club's private Facebook group, which is open only to current members and is not used for marketing. We rely on our legitimate interests in sharing club activities with members and building our club community. This is separate from the marketing preference in Coacha, so opting out of marketing use does not stop photos appearing in this group. You can still object to a particular photograph or video being shared there, or ask for it to be removed, by contacting the Club Secretary at hazlemererunners@hotmail.com with 'Photo Preference' in the subject header, and we will remove it where reasonably practicable.

13. Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

> a. Your consent. You are able to remove your consent at any time. You can do this by contacting the Club Secretary via hazlemererunners@hotmail.com, placing 'Removal of Consent' in the subject header. Please note that by removing your consent for Hazlemere Runners to collect and process your data, your membership of the club will end.
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> b. Legitimate interests. Where we use photographs or video of you for marketing and promotional purposes (see paragraph 12A above), we rely on our legitimate interests in promoting the club and encouraging participation in community sport. You have the right to object to this and to opt out at any time, as set out in paragraph 13B below; opting out will not affect your membership of the club.
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> c. Legitimate interests (private Facebook group). Where we share photographs or video in the club's private Facebook group (see paragraph 12B above), we rely on our legitimate interests in sharing club activities with members and building our club community. You have the right to object to this, as set out in paragraph 12B above; objecting will not affect your membership of the club.

13B. Where we use photographs or video for marketing purposes, we rely on our legitimate interests as set out in paragraph 13(b) above, rather than your consent. When you join or renew your membership on Coacha, there is a marketing photo/video preference in the 'Data & Documents' section of 'My Profile', worded 'Photos/videos of me may be used in club marketing', which is ticked by default. You can change this preference to opt out, either at the point of joining or renewing, or at any later time, by unticking it in Coacha or by contacting the Club Secretary at hazlemererunners@hotmail.com with 'Photo Preference' in the subject header. This preference applies to marketing use only and does not apply to the club's private Facebook group (see paragraph 12B above). Opting out will not affect your membership of the club. Opting out will not affect material already published before your request was received, but we will remove it from future use and, where reasonably practicable, from existing online materials.

How we store your personal information

14. As a condition of membership, your information is collected, stored and processed by Coacha who confirm that they are GDPR compliant. A copy of their privacy policy can be viewed here: https://www.coacha.co.uk/More/Legal/Coacha-privacy

15. The club will retain all personal information held on Coacha for up to 18 months after a member chooses to resign or fails to renew membership. This policy allows former members to rejoin Hazlemere Runners the opportunity to rejoin and retain visibility of any payment information. After this period, we will then dispose of personal information by deleting your membership profile from Coacha.

15A. Photographs and video used for marketing purposes are stored on the club's website and social media accounts, and, where applicable, on club committee devices/cloud storage used for producing club communications. We will retain such material for as long as it remains relevant for promotional use, or until you opt out under paragraph 13B, whichever is sooner.

15B. Photographs and video shared in the club's private Facebook group remain on the group until they are removed by the club or at your request under paragraph 12B.

16. WhatsApp and Facebook Messenger are operated by WhatsApp LLC and Meta Platforms Ireland Limited respectively, and any information you share via those platforms is processed under their own privacy policies, which can be viewed here: WhatsApp Privacy Policy (UK): https://www.whatsapp.com/legal/privacy-policy-uk and Meta Privacy Policy (which covers Facebook Messenger): https://www.facebook.com/privacy/policy/. Both platforms may transfer information outside the UK, including to the United States. The club's private Facebook group is also operated by Meta Platforms Ireland Limited, so the same applies to information shared in that group.

17. The club does not control how long WhatsApp or Meta retain information processed on their platforms; removing a member from a club group does not delete any information already processed by WhatsApp or Meta. Members should not share special category data (such as health, injury or medical information) via these group chats or the club's private Facebook group.

18. The club reserves the right to remove any person from a club WhatsApp and/or Facebook Messenger group, or the club's private Facebook group, where they are not, or are no longer, a current member of Hazlemere Runners. Where a member's membership lapses or ends, the club will normally allow a reasonable period of grace before removing them from these groups, but this is at the club's discretion and does not limit the club's underlying right to remove non-members from these groups at any time.

Your data protection rights

19. Under data protection law, you have rights including:

a. Your right of access - You have the right to ask us for copies of your personal information.

b. Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Please note, that members are able to access their online profile and make these amendments.

c. Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances. Please note that any request to erase or delete personal data held on Coacha will end membership of the club.

d. Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

e. Your right to object to processing - You have the right to object to the processing of your personal information in certain circumstances. In relation to photographs and video used for marketing purposes, you can exercise this right by opting out as described in paragraph 13B above. In relation to photographs and video shared in the club's private Facebook group, you can exercise this right as described in paragraph 12B above.

f. Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

19. You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

20. Please contact us at hazlemererunners@hotmail.com if you wish to make a request, placing 'Information Request' into the subject header.

How to complain

21. If you have any concerns about club use of your personal information, you can make a complaint to us at hazlemererunners@hotmail.com, placing 'Personal Information Complaint' into the subject header.

22. You can also complain to the ICO if you are unhappy with how we have used your data.

23. The ICO's address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

24. ICO Helpline number: 0303 123 1113

25. ICO website: https://www.ico.org.uk