



LONDON YOUTH GAMES PRIVACY POLICY

1. Introduction

This Privacy Policy (together with our Standard Terms and any other documents referred to in it) describes the type of information which we collect from you, or from our partners such as the London boroughs on your behalf, through the use of any of our services including our competition management platform ("the Platform"), website and associated apps (collectively "our Services"). It also sets out how that information may be used or disclosed by us and the safeguards we use to protect it.

Our website and platform may contain links to third party websites that are not covered by this Privacy Policy. We therefore ask you to review the privacy statements of other websites and applications to understand their information practices.

We have drafted this Privacy Policy to be as clear and concise as possible. Please read it carefully to understand our policies regarding your information and how we will treat it. By using or accessing our Platform or the Services, you agree to the collection, use and disclosure of information in accordance with this Privacy Policy. This Privacy Policy may change from time to time and your continued use of the Platform or the Services is deemed to be acceptance of such changes, so please check periodically for updates.

This Privacy Policy was last updated on 1st October 2018 and takes account of all changes in Data Protection policy brought in by the new General Data Protection Regulation (GDPR). **Please read this Privacy Policy carefully and ensure that you understand it.** Your acceptance of our Privacy Policy is deemed to occur upon your first use of our Platform. If you do not accept and agree with this Privacy Policy, you must stop using our Platform immediately.





You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

If you have any comments on this Privacy Policy, please email them to info@londonyouthgames.org.

2. Who We Are

2.1 Here are the details that the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regards to the processing of personal data and on the free movement of such data, known as General Data Protection Regulation (GDPR) says we have to give you as a ' data controller ':

- Our Website address is <https://londonyouthgames.org>
- Our company name is London Youth Games Ltd.
- Our registered address is Langwood House, 63-81 High Street, Rickmansworth, Herts. WD3

2.2 We respect your right to privacy and will only process personal information from you in accordance with the Data Protection Legislation which for the purposes of this Privacy Policy shall mean: (i) unless and until the GDPR is no longer directly applicable in the UK, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then (ii) any successor legislation to the GDPR or the Data Protection Act 1998 and other applicable privacy laws.



londonyouthgames.org



3. What we may collect

3.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

3.2 We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- Identity Data includes first name, last name, username or similar identifier. When you email, phone, live chat or otherwise, we may collect information such as your first name, last name, email address and phone number.
- Contact Data includes address, invoicing address, email address and telephone numbers.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this Website.
- Profile Data includes your username and password, reservations made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our Platform and Services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- Interaction Data includes any information that you might provide to any discussion forums on the Platform.
- Cookies Data: like many websites, we use "cookies" to enhance your experience and gather information about visitors and visits to our websites. Please refer to the "Do we use 'cookies'?" section below for information about cookies and how we use them and what kind.
- Third Party Information – this is relevant data we receive from other sources, e.g. we may receive data from a National Governing Body about your membership of that body. We are also working closely with third parties (including, for example, business partners, suppliers, sub-contractors, analytics providers, and search information providers) and may receive information about you from them.
- Analytics includes third-party analytics services (such as Google Analytics) to evaluate your use of the Platform, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our Platform and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data. By accessing and using the Platform, you consent to the processing of data about you by these analytics providers in the manner and for the purposes set out in this Privacy Policy.





3.3 We may also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users participating in a particular type of sport. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.

3.4 Under GDPR we will ensure that your personal data is processed lawfully, fairly, and transparently, without adversely affecting your rights. We will only process your personal data if at least one of the following bases apply:

- A. you have given consent to the processing of your personal data for one or more specific purposes;
- B. processing is necessary for the performance of a contract to which you are a party;
- C. processing is necessary for compliance with a legal obligation to which we are subject;
- D. processing is necessary to protect the vital interests of you or of another natural person;
- E. processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; and/or
- F. processing is necessary for the purposes of the legitimate interests pursued by us or by a third party such as our objective to put on high quality sports competitions and activities, except where such interests are overridden by the fundamental rights and freedoms of the data subject, in particular where the data subject is a child (please see the annex to this Privacy Policy below detailing the Legitimate Interests test we have carried out).

3.5 If we receive personal information in the course of providing our Services to you from another data subject, we expect you to have complete responsibility for ensuring that the contents of this Privacy Policy are brought to their attention and you have obtained their consent in the process.

3.6 In some instances, it may be appropriate for us to combine your information with other information that we may be holding about you, such as combining your name with your geographic location.





4. How we may collect and use your data

4.1 We (or third party data processors, agents and sub-contractors acting on our behalf) may collect, store and use your personal information by way of different methods to collect data from and about you including through:

Direct interactions. You may give us your information by filling in forms via our Platform or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- A. present Platform content;
- B. use any of our Services;
- C. create an account on our Platform;
- D. subscribe to our Services or publications;
- E. request marketing to be sent to you;
- F. enter a competition, promotion or survey; or
- G. give us some feedback.

4.2 In addition to the above, we may use the information in the following ways:

- A. To personalise your Platform experience and to allow us to deliver the type of content in which you are most interested.
- B. To administer a competition, promotion, survey or other site feature.
- C. If you opt-in to receive an e-mail newsletter from us, we may send you periodic e-mails. If you would no longer like to receive promotional e-mail from us you may opt out by changing your profile settings. If you have not opted-in to receive e-mail newsletters, you will not receive these e-mails.
- D. Present Platform content effectively to you.
- E. Provide information, and services that you request, or (with your consent) which we think may interest you.
- F. Provide the relevant Services to you

4.3 If you are already our customer, we will only contact you electronically about things relevant to you.

4.4 If you are a new customer, you will only be contacted if you agree to it.

4.5 We may keep a record of those links which are used the most to enable us to provide the most helpful information but we agree to keep such information confidential and you will not be identified from this information.





4.6 In addition, if you don't want us to use your personal data for any of the other reasons set out in this section, you can let us know at any time by contacting us at info@londonyouthgames.org, and we will delete your data from our systems. However, you acknowledge this will limit our ability to provide the best possible services to you.

4.7 In some cases, the collection of personal data may be a statutory or contractual requirement, and we will be limited in the services we can provide you if you do not provide your personal data in these cases.

4.8 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- A. Where we need to provide our services to you.
- B. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- C. Where we need to comply with a legal or regulatory obligation

4.9 Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to our marketing communications or sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by opting out in your profile options, and we will either delete your data from our systems or move your data to our "unsubscribe list". However, you acknowledge this will limit our ability to provide the best possible services to you.

4.10 As already indicated above, with your permission and/or where permitted by law, we may also use your data for marketing purposes. We agree that we will not do anything which you have not agreed to under this Privacy Policy, and we will not send you any unsolicited marketing or spam. We will take all reasonable steps to ensure that we fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, as amended in 2004, 2011 and 2015.





5.Cookies

What are cookies?

Cookies are small text files containing a string of characters that can be placed on your computer or mobile device that uniquely identify your browser or device. Cookies allow a site or services to know if your computer or device has visited that site or service before. Cookies can then be used to help understand how the site or service is being used, help you navigate between pages efficiently, help remember your preferences, and generally improve your browsing experience.

What types of cookies do our platforms use?

1. Strictly Necessary Cookies. These cookies are essential, as they enable you to move around the platforms and use its features, such as accessing logged in or secure areas.
2. Performance Cookies. These cookies collect information about how you have used the Platforms, for example, information related to the unique username you have provided, so that less strain is placed on our backend infrastructure. These cookies may also be used to allow us to know that you have logged in so that we can serve you fresher content than a user who has never logged in. We also use cookies to track aggregate Platform usage and experiment with new features and changes on the Platforms. The information collected is used to improve how the Platforms work.
3. Functionality Cookies. These cookies allow us to remember how you are logged in, and the options you have set. They help us to tailor the Service to provide enhanced features and content for you. The information these cookies collect may be anonymous, and they are not used to track your browsing activity on other sites or services.

How long will cookies stay on my device?

The length of time a cookie will stay on your computer or mobile device depends on whether it is a “persistent” or a “session” cookie. Session cookies will only stay on your device until you stop browsing. Persistent cookies stay on your computer or mobile device until they expire or are deleted.

How to control and delete cookies

You can choose to enable or disable Cookies in your internet browser. By default, most internet browsers accept Cookies, but this can be changed. For further details, please consult the help menu in your internet browser. You can choose to delete Cookies at any time. However, you may lose any information that enables you to access the platforms more quickly and efficiently including, but not limited to, personalisation settings.





6. Where we store your data and security

6.1 We may transfer your collected data to storage outside the European Economic Area (EEA). It may be processed outside the EEA to fulfil your order and to receive our Services and deal with payment. If we do store or transfer data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the EEA and under the GDPR. Such steps may include, but not be limited to, the use of legally binding contractual terms between us and any third parties we engage with and the use of the EU-approved Model Contractual Arrangements. Your acceptance of this Privacy Policy shall be your consent permitting us to store or transfer data outside the EEA if it is necessary for us to do so.

6.2 Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see the European Commission: EU-US Privacy Shield.

6.3 Data security is of great importance to us, and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure data collected through our Platform. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

6.4 We have 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.

6.5 By giving us your personal data, you agree to this arrangement. We will do what we reasonably can to keep your data secure.

6.6 We have implemented security measures such as Secure Sockets Layers to protect any data and maintain a high level of security.

6.7 Notwithstanding the security measures that we take, it is important to remember that the transmission of data via the internet may not be completely secure and that you are advised to take suitable precautions when transmitting to us data via the internet and you take the risk that any sending of that data turns out to be not secure despite our efforts.

6.8 When you set a password upon registration on our Platform, you must keep it confidential. Please do not share it.





6.9 We will keep personal data for as long as is necessary which is usually the life of our relationship, including assuming that participants will want to remain as “alumni followers” (i.e. past participants) of the Games after they are too old to compete. Participants can always choose to opt out of this. We may however be required to retain personal data for a longer period of time to ensure we comply with our legislative and regulatory requirements. We review our data retention obligations to ensure we are not retaining data for longer than we are legally obliged or permitted to.

7. Disclosing your information

7.1 We are allowed to disclose your information if we have a legal obligation to do so, or in order to protect other people's property, safety or rights.

7.2 We may contract with third parties to supply services to you on our behalf. These may include search engine facilities, advertising and marketing. In some cases, the third parties may require access to some or all of your data.

7.3 Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under GDPR and the law.

8. Your rights

8.1 When you submit information via our Platform, you may be given options to restrict our use of your data. We aim to give you strong controls on our use of your data (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided above in this Privacy Policy).

8.2 Under the GDPR, you have the right to:

- request access to, deletion of or correction of, your personal data held by us at no cost to you;
- request that your personal data be transferred to another person (data portability);
- be informed of what data processing is taking place;
- restrict processing;
- to object to processing of your personal data; and
- complain to a supervisory authority.





8.3 You also have rights with respect to automated decision-making and profiling as set out in section 11 below.

8.4 You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes.

8.5 To enforce any of the foregoing rights or if you have any other questions about our Platforms or this Privacy Policy, please contact us at info@londonyouthgames.org.

9. Links to other sites

9.1 Please note that our terms and conditions and our policies will not apply to other websites that you get to via a link from our Platform. We have no control over how your data is collected, stored or used by other websites and we advise you to check the privacy policies of any such websites before providing any data to them.

10. Changes

10.1 If we change our Privacy Policy, we will post the changes on this page. If we decide to, we may also email you.

11. Terms and Conditions

11.1 Please also visit our Standard Terms and Conditions establishing the use, disclaimers, and limitations of liability governing the use of our Platforms.

13. Your Consent

13.1 By using our Platform and by way of acknowledgment, you consent to our Privacy Policy.





14. Dispute Resolution

14.1 The Parties will use their best efforts to negotiate in good faith and settle any dispute that may arise out of or relate to this Privacy Policy or any breach of it.

14.2 If any such dispute cannot be settled amicably through ordinary negotiations between the parties, or either or both is or are unwilling to engage in this process, either party may propose to the other in writing that structured negotiations be entered into with the assistance of a fully accredited mediator before resorting to litigation.

14.3 All negotiations connected with the relevant dispute(s) will be conducted in confidence and without prejudice to the rights of the parties in any further proceedings.

14.4 If the parties agree on a resolution of the dispute at mediation, the agreement shall be reduced to writing and, once signed by the duly authorised representatives of both parties, shall be final and binding on them.

14.5 If the parties fail to resolve the dispute(s) within 60 days (or such longer term as may be agreed between the parties) of the mediator being appointed, or if either party withdraws from the mediation procedure, then either party may exercise any right to seek a remedy through arbitration by an arbitrator to be appointed by our lawyers under the Rules of their Arbitration Scheme.

14.6 Any dispute shall not affect the parties' ongoing obligations under this Privacy Policy.

