



Hampstead & Westminster Hockey Club

EST 1894

PRIVACY NOTICE

This Privacy Notice applies to personal information held by HWHC Limited as data controllers and processors, as described below. It covers how we collect, use, store, share and secure the data that you supply to us and your rights about data that we hold about you. It applies to current and former members, players, customers, employees, contractors, sub-contractors, volunteers, office holders and participants.

Some of the links on our websites lead to third party websites with their own privacy notices, which may be different to this Notice. You will need to ensure that you have read and agreed with their privacy notices if willing to use those other websites.

Wherever we have said 'you' or 'your', this means you and any authorised person to handle your affairs or deals with us on your behalf.

When we say 'we', we mean HWHC Limited. Unless otherwise stated below, the data controller for the purposes of this notice will be HWHC Limited, a Company incorporated in England and Wales, Company number 06893067, with registered office address Reservoir Cottage, Mount View Road, London N4 4SP, England.

What information we collect

We will only collect your information in line with relevant regulations and law. We may collect it from a range of sources and it may relate to any of our services. We may also collect information about you when you interact with us, e.g. visit our websites or mobile channels, call us or enquire about any of our services.

Some of the data will come directly from you. It can also come from your representatives or other sources you have asked us to obtain information from. We might also get some of it from publicly available sources.

We will collect, store and use the following data:

Information that you provide to us, e.g.:

- Personal details, e.g. name, previous names, gender, date and place of birth;
- Contact details, e.g. address, email address, landline and mobile numbers;
- Information concerning your identity e.g. photo ID, passport information, national ID card and nationality;
- Bank account, payment card and Paypal details;
- Marketing and advertising responses and preferences; telematics data, GPS data;
- Results data from the services which may include other third party data;
- Any other data about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online or otherwise.

Information we collect or generate about you, e.g.:

- Information about your relationship with us, including the services you are using, the channels you use and your ways of interacting with us;
- Membership history, payment history and transactions records;
- Information concerning complaints and disputes;



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- Information we use to identify and authenticate you, e.g. your signature, electronic signature, photo ID, and additional information that we receive from external sources that we need for compliance purposes;
- Marketing and sales information, e.g. details of the products and services you receive and your preferences;
- Cookies and similar technologies we use to recognise you, remember your preferences and tailor the content we provide to you;
- Investigations data, e.g. due diligence checks, sanctions watch list data and any other data obtained pursuant to anti-money laundering checks;
- Records of correspondence and other communications between us, including email, live chat, instant messages and social media communications;

The information we collect from other sources may include information from third party providers, e.g. information that helps us to combat fraud or that relates to your social interactions, including your communications via social media.

How we will use your information

We will only use your information where we have your consent or we have another lawful reason for using it.

The reasons we use your information include to:

- Deliver our services;
- Carry out your instructions;
- Manage our relationship with you, including (unless you tell us otherwise) telling you about products and services we think may be relevant for you;
- Understand how you use our services;
- Support operations of the services we provide you;
- Investigate and resolve complaints;
- Ensure security and business continuity;
- Risk management;
- Provide online services and other online product platforms;
- Implement product and service improvement;
- Undertake data analytics to better understand your circumstances and preferences so we can make sure we can provide you with the best service and offer you a tailored service;
- Protect our legal rights and comply with our legal obligations;
- Prevent or detect crime, including fraud and financial crime;
- Correspond with third party intermediaries;
- Undertake system or product development and planning, audit and administrative purposes.

Tracking or recording what you say or do

We may record details of your interactions with us. We may record and keep track of conversations you have with us, including phone calls, face-to-face meetings, letters, emails, live chats, video chats and any other kinds of communication. We may use these recordings to check your instructions to us, assess, analyse and improve our service, train our people, manage risk or to prevent and detect fraud and other crimes. We may also capture additional information about these interactions, e.g. telephone numbers that you call us from and information about the devices or software that you use.



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Marketing and market research

We may use your information to provide you with details about other products and services from relevant third parties. We may send you marketing messages by post, email, telephone, text or secure messages. You can change your mind on how you receive marketing messages or choose to stop receiving them at any time. To make that change, please contact us.

If you ask us not to send you marketing information, it may take us a short period of time to update our systems and records to reflect your request, during which time you may continue to receive marketing messages. Even if you tell us not to send you marketing messages, we will continue to use your contact details to provide you with important information, such as changes to your terms and conditions or if we need to tell you something to comply with legal or regulatory obligations.

Data controlling, processing and sharing

By continuing your membership and/or using our services on and after 25 May 2018, you expressly consent to the engagement of another data controller and processor unilaterally chosen by HWHC Limited for the processing of your personal data. This may be needed where activities are carried out by third-party service providers (including contractors and designated agents) including but not limited to general administration, legal and tax advisory, insurance, IT services or where we have a legitimate business reason for doing so such as change in ownership or business restructure.

Where we engage another controller and processor for carrying out specific controlling and processing activities of your personal data, the same data protection obligations shall be imposed on that other controller and processor by way of a contract or other legal act under EU or governing Member State law, in particular providing sufficient guarantees to implement appropriate technical and organisational measures in such a manner that the processing will meet the requirements of the GDPR.

Who we might share your information with

We may share your information with others where lawful to do so, including where we or they:

- Need to in order to provide you with products or services you have requested;
- Have a public or legal duty to do so, e.g. to assist with detecting and preventing crime;
- Need to in connection with litigation or asserting or defending legal rights and interests;
- Have a legitimate business reason for doing so, e.g. change in ownership, to manage risk, verify your identity, enable another company to provide you with services you have requested, or assess your suitability for products and services.

In that respect, we may share your information for these purposes with others, including:

- Any sub-controllers and processors of data subject information, sub-contractors, agents sub-contractors, agents or service providers who work for us or provide services to us including their employees, sub-contractors, service providers, directors and officers;
- Any brokers who introduce you to us or deal with us for you;
- Any entity that has an interest in the products or services that we provide to you, including if they take on the risk related to them (this could include but is not limited to England Hockey and League administrators, or Regional Umpiring Associations);
- Any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- Law enforcement, government, courts, dispute resolution bodies, regulators, auditors and any party appointed or requested by regulators to carry out investigations or audits of our activities;
- Other parties involved in any disputes, including disputed transactions;



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- Fraud prevention agencies who will also use it to detect and prevent fraud and other financial crime and to verify your identity;
- Anyone who provides instructions or operates on your behalf, e.g. officially authorised third parties, solicitors, and other intermediaries;
- Anybody else that we have been instructed to share your information with by either you, or operates any of your accounts on your behalf.

Transfers of data outside of the EU

Your information may be transferred to and stored in locations outside of the European Economic Area (EEA), including countries that may not have the same level of protection for personal information as the EEA do. When we do this, we will ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries the law might compel us to share certain information, e.g. with tax authorities.

We will ensure that, to the extent that any personal data originating from the United Kingdom (UK) or European Economic Area (EEA) is transferred by us to another controller and/or processor in a country or territory outside the UK or EEA that has not received a binding adequacy decision by the European Commission or competent national data protection authority, such transfer will be subject to an appropriate transfer mechanism that provides an adequate level of protection in accordance with GDPR.

Data Retention

We keep your information in line with our data retention policy. We will normally keep your personal and financial data for a period of six years from the end of our relationship with you. This enables us to comply with legal and regulatory requirements or use it where we need to for our legitimate purposes, such as disputes or concerns that may arise.

We may need to retain your information for a longer period, where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from auditors and regulators.

If we do not need to retain information for this period of time, we may destroy, delete or anonymise it more promptly.

Your Rights

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. Please refer to our DSAR Procedure for more information.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes



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you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

You can exercise your rights by contacting us through our website <http://hw Hockey Club/contact-us/> or by post at HWHC Limited, PO Box 70387, London SE1P 4UP.

How we keep your information secure

We use a range of measures to keep your information safe and secure, which may include encryption and other forms of security. We require our staff and any third parties who carry out any work on our behalf to comply with appropriate compliance standards, including obligations to protect any information and applying appropriate measures for the use and transfer of information.

Your duty to inform us of changes

You are responsible for making sure the information you give us is accurate and up to date, and you must tell us if anything changes as soon as possible. If you provide information for another person, you will need to direct them to this Privacy Notice. If we need that person's consent, we will ask you to confirm that you have obtained such consent.

Complaints and queries

If you have any questions about this Privacy Notice or how we handle your personal information, please contact us through our website <http://hw Hockey Club/contact-us/> or by post at HWHC Limited, PO Box 70387, London SE1P 4UP.

If you are not satisfied by our response you also have the right to make a complaint to the Information Commissioner's Office (ICO).

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any material updates. We may also notify you in other ways from time to time about the processing of your personal data.

HWHC Limited

Company number 06893067

Registered in England and Wales

Registered office address: Reservoir Cottage, Mount View Road, London, England, N4 4SP

Postal address: HWHC Limited, PO Box 70387, London SE1P 4UP

Web: <http://hw Hockey Club.co.uk>