



LONDON YOUTH GAMES FOUNDATION PRIVACY POLICY

1. Introduction

This Privacy Policy describes the type of information which we collect about people who interact with LYG in any way – whether as participants/volunteers/coaches etc. or electronically, e.g. through use of our website or app. 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. We may, at times, make changes to this Policy, e.g. to reflect changes in legislation or best practice, so please do come back to this document. If we make material changes, and we have your e-mail address, we will let you know.

This Privacy Policy was last updated on 24th March 2019 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.**

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

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

We respect your right to privacy and will only process personal information from you in accordance with relevantly applicable legislation governing the processing of personal data.

3. What we may collect

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows – though there are obvious areas of overlap:

- 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. This may also include such identity data as are necessary to assess eligibility for competitions or gain insight into who takes part, e.g. age, school, gender, ethnicity, standard of play, etc.
- Contact Data includes 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 our 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 app and website.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- 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 our app and website, compile reports on activity, collect demographic data, analyse performance metrics, and collect and evaluate other information relating to our app, website and internet usage. These third parties use cookies and other technologies to help analyse and provide us the data.

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.



4. How we may collect and use your data

We will always collect and use your data only in accordance with relevant legislation governing the use of personal data.

We will usually collect your data in one of the following ways:

- through you (or your parent/guardian) giving it to us directly, e.g. through registering on our app/website;
- through a member borough or other third party collecting it from you and passing it on for the purposes of participating;
- through your usage of our app or website.

We will then usually use your data for one of several different reasons:

- to enable us to run fair, safe and appropriate programmes for young people to participate in;
- to assess and learn from our performance in providing a diverse offer to young people from all communities and backgrounds in London;
- to keep records of performance and participation for historical reference purposes;
- to keep you informed of opportunities to take part in our programmes or those of our partners and members, or about offers from them.

In relation to the uses in the first three bullets immediately above, we are processing this data on the basis of “legitimate interests” as set out in the General Data Protection Regulation. This is because people wishing to take part in or find out more about our programmes would reasonably expect us to use data in these ways; because the processing is necessary in order to deliver our programmes; because our needs to process the data are not outweighed by the individual’s interests, rights and freedoms; and because there is both a personal and broader societal benefit to what we do.

In relation to the final bullet point, however, we believe the appropriate basis for using data in this way is “consent”. What this means is that we will never contact you in relation to a programme or offer you have not directly expressed interest in without your permission.

In addition, if at any point, you decide that you do not want us to process data about you, 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, this may mean that you are unable to compete in our programmes if we are unable to verify your personal details.



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 website/app and use features, such as accessing logged in or secure areas.
2. **Performance Cookies.** These cookies collect information about how you have used the website/app, 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 usage and experiment with new features and changes on the website/app. The information collected is used to improve how the website/app 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 our website/app 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

We may transfer your collected data to storage outside the European Economic Area (EEA). 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.

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.

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.

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.

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



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.

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

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

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.

We may contract with third parties to supply services to you on our behalf. We will ensure that they apply the same standards as set out in this Policy.

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

When you submit information via our website/app, 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).



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.

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

You have the right to ask us not to process your personal data for marketing purposes.

To enforce any of these rights or if you have any other questions about our website/app or this Privacy Policy, please contact us at info@londonyouthgames.org.

9. Links to other sites

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

If we change our Privacy Policy, we will post the changes on this page. If the change is material and we have your e-mail address we may also e-mail you with an update.



11. Dispute Resolution

We will use all reasonable 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.

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.

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.

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.

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.

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