

K-GYMNASTICS

DATA PROTECTION POLICY

Club Number: 91116

Policy Owner: K-Gymnastics – Owner & Head Coach

Responsible Person: Owner & Head Coach / Club Welfare Officer

Date of Policy: September 2026

Review Date: September 2027

1. POLICY STATEMENT

K-Gymnastics is committed to protecting the privacy and personal information of all gymnasts, parents/carers, coaches, volunteers, officials and other individuals connected with the club.

We recognise that many of the people whose information we process are children and young people. We therefore take particular care to ensure that children's personal information is collected, used, stored and shared appropriately and securely.

K-Gymnastics will comply with applicable UK data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as applicable.

Our approach is based on the principle that personal information should be handled fairly, lawfully, transparently, securely and only for appropriate purposes.

2. PURPOSE OF THIS POLICY

This policy explains how K-Gymnastics:

- collects and uses personal information;
 - protects personal information;
 - stores and disposes of information;
 - shares information with other organisations;
 - manages photographs and videos;
 - protects children's information;
 - responds to data protection requests;
 - manages data breaches; and
 - ensures that staff and volunteers understand their responsibilities.
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3. WHO THIS POLICY APPLIES TO

This policy applies to:

- all gymnasts and their parents/carers;
- coaches and other employees;
- volunteers;
- welfare officers;
- judges and officials;
- administrators;
- contractors and service providers working with K-Gymnastics; and
- anyone else who has access to personal information held by the club.

Everyone who handles personal information on behalf of K-Gymnastics is expected to follow this policy.

4. WHAT PERSONAL INFORMATION WE COLLECT

Depending on the services provided, K-Gymnastics may collect information such as:

Gymnast information

- full name;
- date of birth;
- gender, where relevant;
- contact details;
- emergency contact information;
- membership information;
- attendance records;
- class and training information;
- competition information;
- photographs and videos where appropriate permissions have been provided.

Parent/carer information

- name;
- telephone number;
- email address;
- relationship to the gymnast;
- emergency contact information;
- payment and membership information.

Health and welfare information

Where necessary for the safe participation of a gymnast, we may collect relevant information such as:

- medical conditions;
- allergies;
- injuries;
- medication information;
- relevant accessibility or support requirements;
- emergency medical information.

Health information is treated as particularly confidential and is only accessed or shared where there is an appropriate reason to do so.

5. HOW WE COLLECT INFORMATION

Personal information may be collected through:

- membership and registration forms;
- online forms;
- trial booking forms;
- British Gymnastics registration systems;
- emails and other correspondence;
- telephone conversations;
- attendance records;
- incident and accident forms;
- safeguarding records;
- payment records; and
- information provided directly by parents, carers, gymnasts, staff or authorised organisations.

We will aim to collect only information that is relevant and necessary for the purpose for which it is being collected.

6. HOW WE USE PERSONAL INFORMATION

K-Gymnastics may use personal information to:

- register gymnasts for classes;
- manage memberships;
- organise training sessions;
- communicate with parents and carers;
- manage attendance;

- process payments;
- maintain emergency contact information;
- protect the health and safety of gymnasts;
- manage safeguarding and welfare concerns;
- meet British Gymnastics requirements;
- organise competitions, displays and events;
- communicate important club information;
- maintain appropriate financial and administrative records;
- comply with legal obligations; and
- protect the legitimate interests of the club and its members where appropriate.

We will not use personal information for unrelated purposes without an appropriate lawful basis.

7. LAWFUL PROCESSING

K-Gymnastics will ensure that personal information is processed using an appropriate lawful basis under data protection law.

Depending on the circumstances, this may include:

- consent;
- performance of a contract;
- compliance with a legal obligation;
- protection of vital interests;
- legitimate interests; or
- another lawful basis permitted by data protection legislation.

Where consent is relied upon, K-Gymnastics will ensure that consent is appropriately obtained and that individuals understand what they are consenting to.

Consent may be withdrawn where consent is the lawful basis for processing.

8. CHILDREN'S PERSONAL INFORMATION

K-Gymnastics recognises that children's personal information requires particular care.

We will:

- collect only information that is necessary and appropriate;
- explain, in clear language, how information is used;
- involve parents/carers appropriately;

- consider the age and understanding of the child;
- protect children's information from inappropriate disclosure;
- avoid unnecessary sharing of children's personal information;
- keep information secure; and
- consider the best interests of the child when processing their information.

The Information Commissioner's Office (ICO) emphasises that organisations handling children's information should take account of children's specific privacy needs and rights.

9. PHOTOGRAPHS AND VIDEO RECORDINGS

K-Gymnastics may take photographs or videos during training sessions, competitions, displays and club events.

Photographs and videos may be used for purposes such as:

- club records;
- promotional materials;
- the K-Gymnastics website;
- social media;
- newsletters;
- displays and promotional materials.

Where consent is required, K-Gymnastics will obtain appropriate permission before using identifiable images of children for the relevant purpose.

Parents/carers will be given appropriate information about photography and video arrangements.

K-Gymnastics will take reasonable steps to ensure that images of children are used appropriately and are not accompanied by unnecessary personal information.

10. SHARING PERSONAL INFORMATION

K-Gymnastics will only share personal information when there is an appropriate and lawful reason to do so.

Information may be shared, where necessary, with:

- British Gymnastics;

- relevant governing bodies;
- emergency services;
- medical professionals;
- safeguarding professionals;
- the venue or facility where necessary;
- authorised coaches or staff;
- professional service providers acting on behalf of the club; or
- public authorities where required by law.

We will not sell members' personal information to third parties.

We will take reasonable steps to ensure that information shared with third parties is appropriate, necessary and secure.

11. SAFEGUARDING AND DATA PROTECTION

Data protection must not prevent K-Gymnastics from sharing information when necessary to protect a child or another person from harm.

Where there is a safeguarding concern, information may be shared with the appropriate safeguarding professionals, British Gymnastics, emergency services, police or other relevant authorities where necessary and lawful.

Safeguarding concerns will be managed in accordance with the K-Gymnastics Safeguarding and Child Protection Policy.

12. DATA SECURITY

K-Gymnastics will take reasonable technical and organisational measures to protect personal information against:

- unauthorised access;
- accidental loss;
- theft;
- misuse;
- alteration;
- inappropriate disclosure; and
- destruction.

Personal information should not be left unattended or accessible to unauthorised people.

Paper records should be stored securely.

Electronic records should be protected by appropriate passwords and security measures.

Staff and volunteers should not share passwords or login information.

13. EMAIL AND ELECTRONIC COMMUNICATION

When communicating electronically, K-Gymnastics will take reasonable steps to protect personal information.

Staff should:

- check email addresses before sending information;
- avoid sending unnecessary personal information;
- use appropriate recipients;
- avoid forwarding confidential information unnecessarily;
- protect sensitive documents where appropriate; and
- report suspected misdirected emails or data breaches immediately.

Where an email contains sensitive personal information, appropriate security measures should be considered.

14. DATA MINIMISATION

K-Gymnastics will aim to collect and retain only the information that is necessary for legitimate club purposes.

We will regularly review information held by the club and remove or securely dispose of information that is no longer required, subject to legal, safeguarding, insurance or other applicable retention requirements.

The ICO recommends that organisations collect and retain only the personal information they genuinely need.

15. ACCURACY OF INFORMATION

K-Gymnastics will take reasonable steps to ensure that personal information is accurate and up to date.

Parents/carers should inform the club of relevant changes, including:

- telephone numbers;
 - email addresses;
 - emergency contacts;
 - medical information;
 - allergies;
 - relevant health information; and
 - other information necessary for the safe participation of the gymnast.
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16. RETENTION OF INFORMATION

K-Gymnastics will retain personal information only for as long as it is reasonably necessary for the purpose for which it was collected, or for as long as required by law or legitimate club requirements.

Different types of information may need to be retained for different periods.

Safeguarding, accident, financial and membership records may require longer retention periods where appropriate.

When information is no longer required, it will be securely deleted, destroyed or otherwise disposed of.

17. DATA PROTECTION RIGHTS

Individuals may have rights under UK data protection law, including, where applicable:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- rights relating to automated decision-making and profiling where applicable.

These rights are subject to legal exemptions and may not apply in every situation.

Requests relating to personal information should be made to K-Gymnastics.

18. SUBJECT ACCESS REQUESTS

An individual may request access to the personal information that K-Gymnastics holds about them.

Requests should be made in writing where possible and should provide sufficient information to allow the club to identify the individual and locate the relevant information.

K-Gymnastics will respond within the applicable legal timeframe and may need to verify the identity of the person making the request.

Where information concerns another person, particularly a child, K-Gymnastics will consider the relevant legal requirements and the child's rights and interests before disclosing information.

19. DATA BREACHES

A personal data breach may include:

- sending information to the wrong person;
- losing paperwork containing personal information;
- losing a device containing personal information;
- unauthorised access to information;
- accidental disclosure;
- hacking or cyberattack; or
- inappropriate sharing of personal information.

Any suspected data breach must be reported to the Owner/Head Coach as soon as possible.

K-Gymnastics will assess the incident, take steps to contain it, consider whether individuals or the ICO need to be notified, and keep an appropriate record of the incident.

Where a breach is likely to result in a risk to individuals' rights and freedoms, K-Gymnastics will consider the applicable reporting requirements and timescales.

20. CONFIDENTIALITY

Personal information must be treated confidentially.

Staff, coaches and volunteers must not discuss confidential information about gymnasts, parents, staff or safeguarding matters with people who do not have a legitimate reason to receive that information.

Confidential information must not be shared through personal social media accounts or other inappropriate channels.

21. SOCIAL MEDIA

K-Gymnastics recognises the importance of protecting children's privacy when using social media.

Club staff and volunteers must follow K-Gymnastics policies when posting or sharing information about gymnasts.

Personal information, photographs or videos must not be shared on personal social media accounts without appropriate authority and consent where required.

The club will take particular care when publishing information about children online.

22. THIRD-PARTY SERVICE PROVIDERS

Where K-Gymnastics uses external organisations or systems to process personal information, the club will take reasonable steps to ensure that:

- the provider is appropriate for the service;
- information is only used for agreed purposes;
- appropriate security measures are in place; and
- relevant data protection responsibilities are understood.

Examples may include membership systems, payment providers, communication systems, British Gymnastics systems and website providers.

23. RESPONSIBILITIES OF STAFF AND VOLUNTEERS

All staff and volunteers must:

- follow this policy;
- keep personal information confidential;
- only access information necessary for their role;
- keep information secure;
- avoid unnecessary copying or sharing;
- report suspected data breaches promptly;
- follow safeguarding procedures; and

- ask the Owner/Head Coach or Club Welfare Officer if they are unsure how information should be handled.

Failure to follow this policy may result in appropriate action.

24. RESPONSIBILITIES OF PARENTS AND CARERS

Parents and carers are asked to:

- provide accurate information;
 - keep contact and emergency information up to date;
 - notify the club of relevant changes;
 - respect the privacy of other gymnasts and families;
 - avoid photographing or recording other children without appropriate permission; and
 - raise any data protection concerns with K-Gymnastics.
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25. PRIVACY NOTICE

K-Gymnastics will provide parents, carers and other relevant individuals with appropriate privacy information explaining:

- what personal information is collected;
- why it is collected;
- how it is used;
- who it may be shared with;
- how long it is retained;
- individuals' rights; and
- how to raise a data protection concern.

Privacy information will be written in clear and accessible language.

26. COMPLAINTS ABOUT DATA PROTECTION

Anyone who has concerns about how K-Gymnastics handles personal information should first contact the Owner/Head Coach.

K-Gymnastics will investigate concerns fairly and take appropriate action where necessary.

Individuals may also have the right to complain directly to the Information Commissioner's Office (ICO).

27. POLICY REVIEW

This policy will be reviewed at least annually or sooner if:

- data protection legislation changes;
- ICO guidance changes;
- club procedures change;
- there is a significant data breach; or
- new technology or systems are introduced.

The next scheduled review date is **September 2027**.

28. RELATED K-GYMNASTICS POLICIES

This policy should be read alongside:

- K-Gymnastics Safeguarding and Child Protection Policy;
 - K-Gymnastics Anti-Bullying Policy;
 - K-Gymnastics Complaints Policy and Procedure;
 - K-Gymnastics Photography and Video Policy;
 - K-Gymnastics Social Media Policy; and
 - K-Gymnastics Health and Safety Policy.
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29. POLICY APPROVAL

Policy: Data Protection Policy

Organisation: K-Gymnastics

Club Number: 91116

Policy Owner: Owner & Head Coach

Date Approved: September 2026

Review Date: September 2027

Signed: Katya Stefanova

Name: Katya Stefanova

Position: Owner & Head Coach, K-Gymnastics

Date: 02/09/2026

