



ENGLAND HOCKEY

Game Management System Privacy Policy

Summary of how the Game Management System uses your data

- The Game Management System (GMS) is a system used by England Hockey (“EH”), Area Hockey Associations (“Area Association”), Other Hockey Associations (as defined in England Hockey’s rules), leagues, clubs and schools for several of their hockey administration functions. It is particularly used for competition management, club and player registration and discipline reports.
- Data may be provided by you or a club official or by an umpire submitting a report, depending on your role in hockey. Information is shared between clubs, schools, leagues, Area Hockey Associations, Other Hockey Associations and England Hockey in order to facilitate the national game.
- You might be asked to place sensitive data into the system in order to allow England Hockey to carry out diversity monitoring. However, this information is stored and then processed by England Hockey anonymously.
- Some information stored in the Game Management System, particularly about participation and discipline (including cards and suspensions), may be retained indefinitely in order to maintain a record of the game.
- If you are registering a third party into the Game Management System, you must make sure they are aware of this, and direct them to view this privacy policy. Where given an appropriate email address, England Hockey will take steps to ensure individuals are aware of their registration and are provided with this privacy policy.
- The England Hockey privacy policy sets out more details of your data protection rights, including your right to object to certain processing.

What does this privacy policy cover?

This privacy policy describes how England Hockey, Area Hockey Associations, Other Hockey Associations, leagues, schools and clubs will make use of your data when collected or stored in the Game Management System.

The Game Management System collects information in relation to a number of different types of users. This privacy policy focuses on the use of data relating to players, parents, coaches, umpires, match officials, disciplinary officers, club officials, teachers and administrators as held in the Game Management System.

This privacy policy describes your data protection rights, including a right to object to some of the processing which any of the data controllers mentioned above carries out. More information about your rights, and how to exercise them, is set out in the “What rights do I have?” section.

What information does the Game Management System collect?

The Game Management System collects and processes personal data about players, parents and club officials. This will include, depending on your role:

- your name, your unique ID system number, and password;
- your date of birth and gender;
- current and previous affiliations to clubs, teams, schools and associations
- your role within clubs, schools and/or Hockey associations;

- your (or your parent's) contact details, including email address, phone number and physical address as provided by you or your parent;
- any parental relationship you have to another individual in the Game Management System;
- your photograph, where required by your league or Other Hockey Association;
- your nationality and your right to play within hockey competitions and leagues, including no objection certificates (NOC);
- details of whether you have completed any mandatory or recommended checks or training, such as DBS checks, and when these expire; and
- details of any discipline or misconduct as submitted by an umpire or club official; and/or
- details of any appeals against charges or suspensions made on your behalf by a club official.
- where you use a personal account to make or receive payment, card details are collected and processed using Stripe.
- you might be asked to place sensitive data into the system in order to allow England Hockey to carry out diversity monitoring. However, this information is stored and then processed by England Hockey anonymously.

What information is provided by third parties in the Game Management System?

Information is often provided by third parties in the Game Management System. In particular:

- Where you are a player, your registration information may be entered into the system by a club official at your current club or teacher, although this will initially be collected from you. Information about your discipline record and any misconduct charge will be provided by a umpire directly into the Game Management System.
- Where you are a club official, information may be initially entered into the system by another club official (in particular, a Club Admin). Information about whether you have completed relevant training or checks may also be provided by third parties.

How do various parties use this information, and what is the legal basis for this use?

Your club(s) will use this information for the following purposes:

- As required by your club to administer its club and teams, in particular:
 - searching and adding new players to their clubs and teams where you have already been registered on the Game Management System;
 - communicating with you or about you, where necessary, to administer the club, such as inputting information to register you as a player or club official for that season;
 - administering and ensuring the eligibility of players and club officials involved in games and leagues the club is involved in;
 - to communicate with you and organise fixtures, matches and events, including selection of teams;
 - ensuring that children and individuals at risk in the game are appropriately protected from harm, including safeguarding activities and checks of whether appropriate mandatory training and checks have been carried out; and
 - complying with the current England Hockey, Area Hockey Associations, Other Hockey Association and league regulations and rules on the affiliation of clubs and registration of players. In addition, Welsh clubs participating in the England Hockey leagues will comply with the relevant Hockey Wales rules and regulations concerning affiliation of clubs and registration of players.

Your leagues will use this information for the following purposes:

- As required by your league to administer its league and teams, in particular:
 - communicating with you or about you where necessary to administer the league, such as communicating directly with club officials;
 - administering and ensuring the eligibility of players and club officials involved in its league;

- ensuring that children and individuals at risk in the game are appropriately protected from harm, including safeguarding activities and checks of whether appropriate mandatory training and checks have been carried out by club officials in its leagues; and
- complying with the current England Hockey, Area Hockey Association and Other Hockey Association rules and regulations on league sanctioning and registration, and ensuring compliance with any league rules on club affiliation and registration of players.

Your Area Hockey Associations or Other Hockey Associations will use this information for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment as a club official using your personal card details on the Game Management System, in taking your payment and providing you with a receipt of payment.
- As required by your Area Hockey Association or Other Hockey Association to administer the game and pursue its legitimate interests, in particular:
 - communicating with you or about you where necessary to administer the game, such as informing you of a change in registration or informing your clubs of your suspension for an upcoming fixture;
 - communicating with you to make you aware of or ask for your opinion on Area Hockey Association or Other Hockey Association initiatives;
 - administering and ensuring the eligibility of players and club officials involved in games governed by the Area Hockey Association or Other Hockey Association initiatives;
 - maintaining records of the game as played in that Area and/or County, in particular maintaining details of discipline and applying appropriate fines and/or suspensions;
 - ensuring that children and individuals at risk in the game are appropriately protected from harm, including safeguarding activities, and checks of whether appropriate mandatory training and checks have been carried out;
 - if you provide a credit or debit card as payment, checking the validity of the sort code, account number and card number you submit through a third party in order to prevent fraud (see data sharing below); and
 - complying with the current England Hockey rules on the sanctioning of leagues, affiliation of clubs and registration of players and ensuring compliance with any Area Hockey Association or Other Hockey Association initiatives rules and regulations on league sanctioning, club affiliation and player registration.

England Hockey will use this information for the following purposes:

- As required by England Hockey to conduct its business and pursue its legitimate interests, in particular:
 - communicating with you or about you, where necessary, to administer the game, including informing you of a change in registration and responding to any questions you send to the Game Management System's administrators and/or Support Desk;
 - communicating with you to make you aware of or ask for your opinion on hockey initiatives;
 - administering and ensuring the eligibility of players and club officials involved in hockey in England;
 - maintaining records of the game as regulated by England Hockey, in particular maintaining details of discipline and misconduct;
 - monitoring use of the Game Management System, and using this to help it monitor, improve and protect its content, services and sites, and investigate any complaints received from you or from others about the Game Management System or how the Game Management System has been used;
 - ensuring compliance with the current England Hockey rules and regulations on the sanctioning of leagues, affiliation of clubs and registration of players;
 - maintaining records of the game as played in that Area and/or County, in particular maintaining details of discipline and applying appropriate fines and/or suspensions;
 - ensuring that children and individuals at risk in the game are appropriately protected from harm, including safeguarding activities, and checks of whether appropriate mandatory training and checks have been carried out;

- if you provide a credit or debit card as payment, checking the validity of the sort code, account number and card number you submit through a third party in order to prevent fraud (see data sharing below); and
 - providing reward packages (including but not limited to equipment and apparel) to England Hockey accredited clubs;
 - communicating with you to ask for your opinion on England Hockey initiatives;
 - where you are a club official, certain contact details may also be shared publicly through publication on the Game Management System or England Hockey website in order to enable players to contact your club, organisation and/ or Association, provided that you have chosen to make such details available; and
 - we will use data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation or to other relevant regulators, such as the Gambling Commission or other governing bodies, to law enforcement bodies or to employers where appropriate).
- Where you give your consent:
 - England Hockey will send you direct marketing in relation to its relevant products and services, or other products and services provided by England Hockey or England Hockey's official partners and suppliers – this is described in the England Hockey [Privacy Policy](#), together with information on your rights.
 - England Hockey places cookies and uses similar technologies in accordance with its [England Hockey Terms and Conditions](#) and the information provided to you when those technologies are used.
 - For purposes which are required by law:
 - where we are required to hold or collect personal data to meet legal requirements on us, such as keeping health and safety records, details of purchases or ensuring banned participant are not given access to our venues or take part in hockey related activity;
 - where we need parental consent to provide online services to children under 13. However, most of our websites are not designed for children under 13; and
 - where in response to requests by government or law enforcement authorities conducting an investigation.

Withdrawing consent

Wherever England Hockey relies on your consent, you will always be able to withdraw that consent, although it may have other legal grounds for processing your data for other purposes, such as those set out above.

What cookies and/or tracking technologies does England Hockey use?

When you visit one of our websites, we may also collect, process and use information about you and your use of the website, including any forums you visit and how you arrived at our site. Such information may be collected through "traffic data" and may entail the use of "cookies" or other tracking technologies, IP addresses or other numeric codes used to identify your computer. For more information on Cookies please click on the link to our [England Hockey Terms and Conditions](#)

Apple iOS and Android Devices

If you access an England Hockey application from these devices you consent to cookies being stored to your device (and other tracking technologies being used to read data from your device) for the following purposes: keeping you logged in, ensuring that an appropriate version of content is presented, analytics and advertising. Many of these cookies and technologies are essential to the operation of the application. It is not currently possible to opt out or remove these cookies (or prevent use of these technologies) from the device without deleting the application.

How is data shared, where and when?

Where you are registered as a participant, some of your registration information will be available to the Club Admin of that club, school or organisation that you have requested to be linked to within the Game Management System. In particular, your name, your unique system ID and age will be visible to those specific Club Admins. If a Club Admin approves your request to be linked to a club, school or organisation, this will be visible to you when you are logged on to the Game Management System. Clubs, schools and organisations should also inform you if you have been added.



For all participants under 18, Club Admins are required to certify that they have parental consent to add youth players to their club, school or organisation and the respective teams. Unless your existing teams have waived their notice requirements, your existing club and team would be told about the link to a new club or team.

Information about players is also shared amongst the relevant leagues, Area Hockey Associations and Other Hockey Associations for the reasons set out above, and with umpires who need to populate their discipline reports. England Hockey will also have access to data for the purposes set out above.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the parties' legal or legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of the controllers for the purposes identified above. Such third parties include providers of payment processing services and the Game Management System.

If at any point your information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data will be adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules.

Neither England Hockey, Area Hockey Associations, Other Hockey Associations, leagues, clubs, schools, nor any third parties provide any warranty or guarantee as to the accuracy, timeliness, performance, completeness or suitability of the information and materials found or offered on this website for any particular purpose. You acknowledge that such information and materials may contain inaccuracies or errors and we expressly exclude liability for any such inaccuracies or errors to the fullest extent permitted by law.

What rights do I have?

You have the right to **ask any of the relevant data controllers for a copy** of your personal data; to **correct, delete or restrict** (stop any active) processing of your personal data; and to **obtain the personal data you provide to us for a contract or with your consent in a structured, machine-readable format**.

In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where one of the data controllers doesn't have to process the data to meet a contractual or other legal requirement, or where it is using the data for direct marketing).

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, where it would infringe the rights of a third party (including our rights) or if you ask a data controller to delete information which it is required by law to keep or has compelling legitimate interests in keeping. Relevant exemptions are included in both the GDPR and in the Data Protection Act 2018. We will inform you of relevant exemptions we rely upon when responding to any request you make.

In some instances, you will need to contact more than one of the data controllers to ensure your rights are met, as they may have access to different data and have different reasons for holding the data. As the main provider of the system, **England Hockey will be in the best position to provide you with a number of these rights**, particularly access to all information held about you in the Game Management System and to correct any underlying data connected to your account.

To exercise any of these rights, you can get in touch with England Hockey using the details set out below. If you have unresolved concerns, you have the **right to complain** to the Information Commissioner's Office in the UK.

With the exception of photographs where particular leagues do not require the provision of photographs, the provision of optional contact details or use of club official personal payment cards, the provision of player registration and club official data is mandatory to allow the national game to be appropriately administered. If relevant data is not provided, the various data controllers will not be able to administer the game or their club, league, county or Area, ensure the safety, welfare and eligibility of all players and manage and respect the game's disciplinary processes. All other provision of your information is optional. If you or your club fails to provide optional contact information, this might mean the various data controllers cannot inform you of important changes or get in contact with you to seek your opinion.

How do I get in touch with you, or your data protection officer?

If you wish to make a data privacy request, you can do so via post or via email. We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, you can get in touch at mydata@englandhockey.co.uk or by writing to: Data Protection Officer, England Hockey, Bisham Abbey National Sports Centre, Bisham, Marlow, Bucks, SL7 1RR. You can also get in



touch directly with your club through your Club Admin, your league through your League Admin, your Area Hockey Association through the contact details found on the Area websites, or an Other Hockey Association through the relevant website of the Other Hockey Association.

Which club, league or Hockey Association is my data controller?

The data controllers for your information are any club, school, organisation, league, Area Hockey Association or Other Hockey Association you play in or for. England Hockey is also a data controller for all data within the Game Management System. You can check which club, school, organisation, league, Area Hockey Association or Other Hockey Association you are linked with by logging in to the Game Management System. You can also control the extent to which you are linked with clubs or leagues through the Organisation links section of the Game Management System.

How long will you retain my data?

Where a club, school or organisation processes your request to link with them and your associated data, it will do this for as long as you are a member of the club, school or organisation. It may hold your data offline for longer – it will inform you of this separately. You can restrict online access on the Game Management System by exercising your links to these organisations through the system.

Subject to the below, England Hockey, Area Hockey Association or Other Hockey Association and leagues retain your information on the Game Management System for five full seasons after your account has become inactive on the Game Management System. For the avoidance of doubt, activities that will result in your account being deemed active include, but are not limited to, being linked as a member of a club, school and/or organisation or logging onto your account.

The England Hockey, Area Hockey Association or Other Hockey Association will also retain limited information about discipline (including yellow cards, red cards and suspensions) indefinitely in order to maintain a record of the game.

You can contact England Hockey if you no longer wish to participate in the game, and you can change your details by logging in to the Game Management System.

Where your data is held on England Hockey systems, then at the end of the retention periods set out above, we will not irrevocably delete your information for another 3 months – your data will be held in an inactive form for this time to ensure that any consequential links across our systems remain intact in the event that your data is removed in a particular location.

How will you keep my data secure?

England Hockey, Area Hockey Association or Other Hockey Association, leagues, and clubs treat the security for all information submitted or provided by you to us seriously and is of importance to us. We will take reasonable steps to protect or secure this data, including your Personal Data. Accordingly, We may require our employees, administrators or third-party service providers to assist us in implementing or applying appropriate securities measures (such as firewalls, penetration testing and etc). You are also advised not to disclose and secure your own username and password.

Changes to this Privacy Policy

We will keep this Privacy Policy under regular review, and We may update this Privacy Policy from time to time. The updated version shall apply and supersede all previous versions. Hence, it is advisable that you check this Privacy Policy on a regular basis.

Version 1.0
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