



## Privacy notice for BPA members, etc

We are committed to respecting your privacy. This notice explains how we may use personal information we collect and process before, during and after your membership with us; how we comply with the law on data protection; what your rights are; and that, for the purposes of data protection, that we are the controller of your personal information.

British Parachute Association (BPA) is the not-for-profit National Governing Body (NGB) of sport parachuting/skydiving.

References to 'we', 'our' or 'us' in this privacy notice are to British Parachute Association Ltd. 5 Wharf Way, Glen Parva, Leicester LE2 9TF, telephone 0116 278 5271, fax 0116 247 7662, web [www.bpa.org.uk](http://www.bpa.org.uk)

We are a company limited by guarantee, registered in London no 875429 VAT reg no 239 4696 20.

This notice applies to: individual members of BPA, whose details we have collected from one of our Affiliated Parachute Training Organisations (PTOs), or who have joined BPA directly.

This notice also applies to non-members (i) making enquiries about our sport; (ii) and/or subscribing to, and/or purchasing goods or services from BPA, such as but not limited to subscribers to the BPA magazine, newsletter or other publications; and individuals registered on the BPA register of authorised pilots of parachuting aircraft; and (iii) non-members who may be witnesses to, or otherwise able to assist us in, the investigation of complaints, disputes, accidents or incidents.

Our contact details are set out in the 'Contact us' section at the end of this privacy notice.

### 1. Personal information we may collect from you

When you sign up for membership with us, or contact us with an enquiry, or purchase goods and/or services from us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allow us to contact you directly such as name, title, email address/es and telephone number/s;
- date of birth;
- gender;
- category of membership and start date, and renewal date (as applicable);
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- if you attend meetings at BPA HQ, CCTV footage;
- records of your attendance at any events or competitions authorised or sanctioned by us or by the World Air Sports Federation (FAI) or its agents and representatives;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

## **Competitors/participants**

If you are a competitor/participant who has registered his/her interest in participating in the sport competitively, you may also provide us with or we may obtain the following additional **personal information** from you

- identification documents such as passport and identity cards;
- details of any Affiliated Parachute Training Organisation (PTO)/ team membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any competitor rankings, gradings or ratings, competition results, details regarding events/competitions attended and your performance therein;
- any disciplinary and grievance information;
- any details required for the purposes of awarding sponsorships funding or grants (including any means testing);
- identification documents such as passport, utility bills, identity cards, etc, where necessary (for example for the award of a British Sport Parachuting/Skydiving Sporting Licence under World Air Sports Federation (FAI) rules, under the delegated authority of the Royal Aero Club of the United Kingdom.

## **Coaches and officials**

If you have registered with us to receive more information about our coaching/instructing qualification schemes and/or any of our education and teaching programmes you may also provide us with or we may obtain the following additional personal information from you:

- any coaching qualification, rating, or official number;
- your current Affiliated PTO or other organisation/team (if applicable);
- coaching/instructional qualification(s)/rating(s) and/or officiating history;
- qualification/rating start and end date;
- identification documents such as passport, utility bills, identity cards, etc.

## **2 Special categories of personal information**

We may also collect, store and use the following '**special categories**' of more sensitive personal information regarding you:

- information about your health, including any medical condition, health and sickness records, medical records and health professional information.
- We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that the processing is necessary to protect and safeguard your health, safety and welfare as a participant or prospective participant in the sport; and/or to protect and safeguard the health, safety and welfare of others participating in the sport or who may be affected by your participation or prospective participation in the sport;
- it is necessary for the establishment, exercise or defence of legal claims;
- based on your explicit consent.

In the table below, we refer to these as the 'special category reasons for processing of your personal data'.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

### 3 Where we collect your information

- We typically collect personal information about our members when you create an account on our site at [www.bpa.org.uk](http://www.bpa.org.uk) to become a member of British Parachute Association Ltd to purchase membership or any services or products we may offer online, when you make an enquiry and/or complaint or when you correspond with us by phone, e-mail or in some other way.
- If you are a member/participant in skydiving/sport parachuting, we also may collect personal information about you from any PTO/team or other organisation you are associated with or from other referrals such as from sport parachuting centres or bodies outside the UK where you have participated in the sport outside the UK.
- If you are providing us with details of referees, next of kin, beneficiaries, family members and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the 'Your rights in relation to personal information' section below.

### 4 Uses made of the information

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
<b>All Members, customers, enquirers, etc</b>		
<b>To administer any membership account(s) you have with us and managing our relationship with you, including arranging for any insurance and dealing with payments and any support, service or product enquiries made by you</b>	All contact and membership details, transaction and payment information, records of your interactions with us, and marketing preferences.	This is necessary to enable us to manage and administer your membership contract with us.
<b>To arrange and manage any contracts for the provision of any services, products or merchandise from us.</b>	All contact and membership details.  Transaction and payment information.	This is necessary to enable us to administer and perform any contract for the provision of services, products and merchandise from us.
<b>To send you information which is included within your membership benefits package, including details about your insurance, safety information and advice, news of the sport, competitions and events, partner offers and discounts.</b>	All contact and membership details	This is necessary to enable us to manage and administer your membership contract with us.

<b>To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about membership, events, participation products and information about our commercial partners.</b>	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so (opted in).
<b>To answer your enquiries or complaints</b>	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership and/or about any product, service or item of merchandise you have purchased, or may be considering purchasing, from us.
<b>Retention of records</b>	All the personal information we collect	<p>We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records, including financial accounting requirements.</p> <p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<b>The security of our IT systems</b>	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct data analytics studies to better understand event attendance and trends within the sport</b>	Records of your attendance at any events or competitions sanctioned by us or by the World Air Sports Federation its agents or representatives.	We have a legitimate interest in doing so to ensure that our membership and our products and services are targeted and relevant.
<b>For the purposes of promoting the sport, our events and membership packages.</b>	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
<b>To comply with health and safety requirements and to regulate conduct of the sport in accordance with the BPA Operations Manual</b>	Records of attendance, records of accidents and incidents	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.

<p><b>To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any coach/instructor programme</b></p>	<p>All performance and attendance data and information about your health and medical condition.</p> <p>Details of any Affiliated PTO and/or Team membership.</p>	<p>This is necessary to enable us to properly manage and administer your development through the training programme.</p> <p>We process special category personal data on the basis of the special category reasons for processing of your personal data' referred to in section 2 above.</p>
<p><b>To make decisions about your progression and development through any qualification/coaching/instructional programme and to assist with the delivery of ratings or qualifications</b></p>	<p>All performance and attendance data and information about your health.</p> <p>Details of any Affiliated PTO and/or team membership.</p>	<p>This is necessary to enable us to properly manage and administer your development through our training programmes.</p> <p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p>
<p><b>To administer and monitor your attendance and performance at events and competitions</b></p>	<p>All non-medical performance and attendance data.</p> <p>Details of any Affiliated PTO and/or team membership.</p>	<p>This is necessary to enable us to register you on to and properly manage and administer our events and competitions.</p>
<p><b>To arrange for any trip or transportation to and from an event, such as our National Delegations to international skydiving events</b></p>	<p>Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.</p>	<p>This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.</p> <p>We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.</p>
<p><b>To administer any drug and alcohol testing</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p>
<p><b>To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to facilities for the sport</b></p>	<p>Health and medical information</p>	<p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p>

<p><b>To gather evidence for possible grievance or disciplinary hearings</b></p>	<p>All the personal information we collect including any disciplinary and grievance information.</p>	<p>We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications.</p> <p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
<p><b>To assess your eligibility for and to provide any sponsorship funding and/or grants</b></p>	<p>All details required for the purposes of awarding sponsorship funding or grants (including any means testing)</p>	<p>This is necessary to enable us to properly administer and perform any contract for the provision of funding.</p>
<p><b>For the purposes of equal opportunities monitoring</b></p>	<p>Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and</p> <p>performance data</p>	<p>We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.</p> <p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p>
<p><b>Coaches, instructors, packers, riggers, judges, pilots and officials</b></p>		
<p><b>To administer your attendance at any courses or programmes you sign up to</b></p>	<p>All contact and membership details, transaction and payment data.</p> <p>Details of your current Affiliated PTO or other, coaching/instructing/packing rigging/judging/flying qualifications/ratings and/or officiating history.</p>	<p>This is necessary to enable us to register you on to and manage and administer your development through the course and/or programme.</p>
<p><b>To conduct performance reviews, managing performance and determining performance requirements</b></p>	<p>All performance and attendance data and information about your health.</p> <p>Details of your current Affiliated PTO or other, coaching/instructing/packing rigging/judging/flying qualifications and/or officiating history.</p> <p>Qualification start and renewal/end dates.</p>	<p>This is necessary to enable us to properly manage and administer your development through the course and/or programme.</p> <p>We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.</p>

<b>To make decisions about your progression and accreditation status</b>	As above.	As above.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>To administer any drug and alcohol testing</b>	Health information	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.  We process special category personal data on the basis of the 'special category reasons for processing of your personal data' referred to in section 2 above.
<b>To arrange for any trip or transportation to and/or from an event such as for our National Delegations taking part in international skydiving events</b>	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event.  We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership.

For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able properly to perform our contract with you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as set out in the 'Contact us' section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5 Direct marketing

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about events, products and services in which we believe you may be interested.

We will only send marketing messages to you in accordance with the marketing preferences you set. You can then let us know at any time that you do not wish to receive marketing messages - see the 'Contact us' section at the end of this notice. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## 6 Disclosure of your personal information

We share personal information with the following parties:

- any party approved by you;
- to any governing bodies or regional bodies for the sport parachuting/skydiving to allow them to properly administer the sport on an international basis;
- other service providers: for example, payment processors, magazine and newsletter distributors, auditors, election scrutineers, data analysis, CCTV contractors, contractors or suppliers and IT services (including membership management, website, video- and teleconference services);
- agencies and bodies associated with administration of the sport, nationally and internationally, including for the purposes of administering competitions and awards: The Royal Aero Club of the United Kingdom, the International Parachuting Commission (IPC), the World Air Sports Federation (FAI), and host centres of domestic and international skydiving competitions;
- our supply chain partners and sub-contractors, such as couriers, import/export agents, shippers;
- where you have given your express for us to do so, our commercial partners: for the purposes of providing you with information on any special offers, opportunities, products and services and other commercial benefits;
- the Government or our regulators: where we are required to do so by law or to assist with their investigations or initiatives;
- police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

We do not disclose personal information to anyone else except as set out above.

## 7 Transferring your personal information internationally

The personal information we collect is not transferred to and stored in countries outside of the UK and the European Union except if you are a BPA Member competing in a duly sanctioned international competition in a country outside of the UK and the European Union.

Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third party processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the 'Contact us' section below.

Should we have concerns or be unsure about the quality of data protection in a certain country or region of the world, we shall share this with relevant data subjects in order for them to decide whether or not they wish to compete/officiate/visit that country as part of a British delegation or otherwise to represent British Skydiving.

## 8 How long do we keep your personal information?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements including financial accounting requirements.

Information that may be relevant to third party public liability and/or personal injury claims, or discrimination claims, may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period may typically extend until years after you have been a member.

We may therefore retain historic records of lapsed members for a period of up to 7 years.

CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your telephone number or email address. Most members will be able to update some of the personal information we hold about you through our online membership portal and we encourage you to do use this facility to help us to keep your personal data up-to-date. Alternatively, you can contact us using by using the details set out in the 'Contact us' section below.

## 9 Your rights in relation to your personal information

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information;
- the right to request that we transfer elements of your data either to you or another service provider; and
- the right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making, may not apply as they have specific requirements and exemptions which apply to them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the 'Contact us' section below.

If you are unhappy with the way we are using your personal information, you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

## **10 Changes to this notice**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

## **11 Contact us**

To update the personal information we hold about you, or in the event of any query or complaint in connection with the information we hold about you, please

- email us at [membership@bpa.org.uk](mailto:membership@bpa.org.uk)
- write to us at British Parachute Association Ltd, 5 Wharf Way, Glen Parva, Leicester LE2 9TF
- telephone us on 0116 278 5271

or

- fax us on 0116 247 7662.