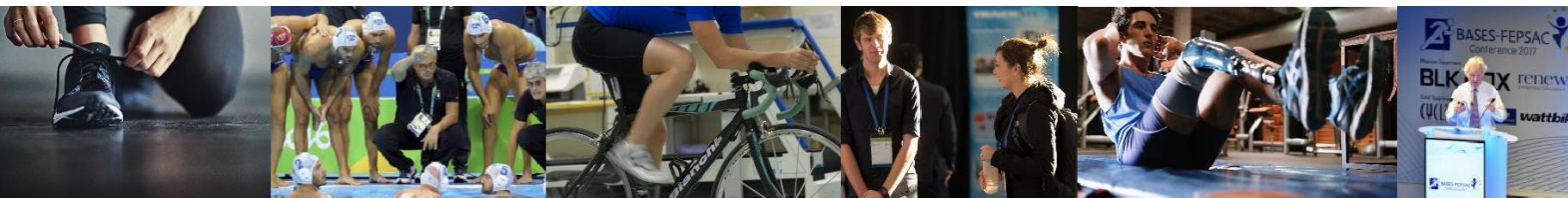




The British Association of  
Sport and Exercise Sciences

# BASES Data Protection Policy

December 2021



*“Promoting **excellence** in **sport** and **exercise sciences**”*

## Introduction

### The British Association of Sport and Exercise Sciences (BASES)

The British Association of Sport and Exercise Sciences (BASES) is the professional body for sport and exercise sciences in the UK. BASES is a Company Limited by Guarantee (#5385834). As a membership organisation responsible for processing the data of its employees, members and third parties, BASES recognises its obligations under GDPR to ensure appropriate use and protection of the personal data that it processes.

### General Data Protection Regulations (GDPR)

BASES is committed to complying with data protection law and to respecting the privacy rights of individuals. This policy applies to all our staff, workers, directors, volunteers and consultants (“Workers”).

This GDPR Policy (“Policy”) sets out our approach to data protection law and the principles that we will apply to our processing of personal data. The aim of this Policy is to ensure that the organisation processes personal data in accordance with the law and with the utmost care and respect.

Data protection law is a complex area. This Policy has been designed to ensure employees of the organisation are aware of the legal requirements and provide practical guidance on how to comply with them; and to inform members of the Association about the data we hold and we comply with our obligations as a data controller. This Policy also sets out the consequences of failing to comply with legal requirements. However, this Policy is not an exhaustive statement of data protection law nor of our responsibilities in relation to data protection.

### Definitions

<p><b>Personal data</b></p>	<p>‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</p> <p><i>Personal data we gather may include: individuals' phone number, email address, educational background, financial and pay details, details of certificates and diplomas, education and skills, marital status, nationality, job title, and CV.</i></p>
<p><b>Special categories of personal data</b></p>	<p>Special categories of data include information about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings, and genetic and biometric</p>



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	information —any use of special categories of personal data should be strictly controlled in accordance with this policy.
<b>Data controller</b>	‘Data controller’ means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by law.
<b>Data processor</b>	‘Processor’ means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.
<b>Processing</b>	‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

## Data protection principles

BASES shall comply with the principles of data protection (“The Principles”) enumerated in the EU General Data Protection Regulation. We will make every effort possible in everything we do to comply with these principles. The Principles are:

### 1. Lawful, fair and transparent

Data collection must be fair, for a legal purpose and we must be open and transparent as to how the data will be used.

### 2. Limited for its purpose

Data can only be collected for a specific purpose.

### 3. Data minimisation

Any data collected must be necessary and not excessive for its purpose.

### 4. Accurate

The data we hold must be accurate and kept up to date.

### 5. Retention

We cannot store data longer than necessary.

### 6. Integrity and confidentiality

The data we hold must be kept safe and secure.



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## Processing of personal data

### What personal data do we process and where does it come from?

BASES processes personal data relating to three groups:

- *Employees*
- *Members of the Association*
- *Third parties who provide personal data to BASES through the provision of products and/or services (“Third parties”)*

### Employees

We typically collect personal information about employees through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout the period of you working for us.

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- date of birth;
- gender;
- marital status;
- referee details, next of kin and emergency contacts;
- national insurance number and other tax or governmental identifiers;
- bank accounts, payroll and tax status
- salary, insurance, annual leave, pension, benefit entitlement and expenses;
- start date and leaving date;
- location of employment or workplace;
- attendance history;
- identification documents and information, such as passport;
- recruitment (including copies of right to work documentation, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- employment records and notes (including job titles, work history, working hours, training records, professional memberships, maternity, parental and compassionate leave and details of any home-working assessment for health and safety purposes) and education and professional records/qualifications;
- performance data including that generated through our appraisal systems;
- disciplinary and grievance information;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- images in video and/or photographic form and voice recordings;
- records of enquiries and other correspondence with you.



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## Members of the Association

We typically collect members' personal information through the membership sign up process, either directly from the member, or sometimes from an employer or institution acting on a member's behalf. Additional information is collected during membership based on a member's level of engagement and whether a member chooses to fulfil any role for the organisation, attend an event, or apply for any accreditations, awards or grants.

- personal contact details that allow us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- your occupation status, job role and employer
- details/copies of your qualifications and academic certificates (for accreditations)
- 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;
- records of your attendance at any events hosted by us or our partners;
- records of any roles you have undertaken or positions you have held within our organisation
- your communication and subscription preferences
- any data submitted by you as part of an application for any accreditation, certification, award or grant administered by us;

## Third parties

We typically collect personal information about third parties when individuals who are not members of the Association access or utilise products and/services offered by the organisation to non-members; or when third parties sign up to receive news and/or updates about BASES and our products and services.

- personal contact details that allow us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- your occupation status, job role and employer



- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- records of your attendance at any events hosted by us or our partners;
- your communication and subscription preferences

## Special categories of personal data

Previously known as sensitive personal data, special categories of personal data is data about an individual which is more sensitive, thus requiring more protection. The special categories include information about an individual's:

- race
- sex
- gender
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sexual orientation

BASES may undertake surveys to determine whether our equity, diversity and inclusion policies are fair and effective; to understand our member demographic and to determine whether any actions need to be undertaken to rectify any issues with representation and/or member opportunities. We do this by analysing the information that is provided to us in an anonymous, de-personalised and aggregated format. This information is collected during membership registration and membership renewal. All special categories of personal sensitive information are subject to enhanced protection and safeguarding, including controlling who can access it, encryption, and physical security measures.

## Lawful basis for processing personal data

Under the GDPR regulations, data controllers must ensure they have legal grounds for obtaining, storing, and processing the personal data they hold about individuals. More details about the lawful basis for processing specific types of personal information can be found in BASES Privacy Notices (see Appendix 1 and 2)

### Employees

The following is the lawful basis for the processing of BASES employee personal information:

*Performance of a contract:* Processing of data that is necessary for the performance of a contract is valid legal grounds where processing is required. This applies to all personal data that is required to manage and perform our contract with you, including payroll, accounting,



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auditing, system security, assessing suitability for jobs or tasks managing employee benefits including leave entitlement and dealing with legal disputes.

*Legal obligations:* Legal obligations are imposed on employers, such as the obligations under health and safety legislation, and tax legislation, which represents valid grounds for the processing of employee data. This applies to all data that, as an employer, we have a legal obligation to process, including payroll and tax status, checking legal rights to work in the UK, providing employment benefits and data necessary for compliance with health and safety regulations

*Legitimate interest:* Making improvements to efficiency in the workplace and the protection of company assets are valid grounds for processing under 'legitimate interest', where the processing of personal data is necessary and/or there is a reasonable expectation (by the data subject) that this data will be processed. This applies to personal data relating to employee and organisational performance, business planning, managing sickness absence and dealing with employee disputes.

## **Members of the Association**

*Performance of a contract:* Processing of data that is necessary for the performance of a membership contract is valid legal grounds where processing is required. This applies to personal data that is required to manage and perform our contract with our members, including contact details, transaction and payment information, records of interactions with us and data that enables us to tailor our products and services to fulfil our contractual obligations.

*Legitimate interest:* Improving the relevance and quality of our products and services represents valid grounds for processing under 'legitimate interest', where the processing of personal data is necessary (i.e., cannot be done another way) and/or there is a reasonable expectation (by the data subject) that data will be processed. This includes personal information and data about the engagement and interactions of members.

## **Third parties**

*Performance of a contract:* Processing of data that is necessary for the performance of a membership contract is valid legal grounds where processing is required. This applies to personal data that is necessary to provide products and/services to non-members of BASES, such as workshop events, conferences, and webinars.

*Consent:* Processing of data for which freely given, specific, informed, and unambiguous consent has been given is valid legal grounds for processing data. This applies to personal data that is provided by third parties signing up to receive news, updates or offers and includes basic contact and preference information such as name, e-mail address and subscription/marketing preferences.

## **How do we use personal data?**

### **Employees**

- Making a decision about your recruitment or appointment and managing the



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- recruitment process and determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
  - Producing and maintaining business records, staff directories, websites and other internal and external business documentation and materials;
  - Paying you and, if you are an employee, deducting tax and National Insurance contributions;
  - Providing benefits of employment or working, including flexible benefits and liaising with benefit providers;
  - Administering the contract we have entered into with you;
  - Conducting performance reviews, grievance or disciplinary hearings, managing performance and determining performance requirements and making decisions about compensation and benefits;
  - Business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you;
  - Assessing qualifications for a particular job or task, including decisions about promotions and ascertaining your fitness to work, education, training and development requirements;
  - Making decisions about your continued employment or engagement or termination of our working relationship;
  - Managing sickness absence;
  - Complying with health and safety obligations;
  - Dealing with legal disputes involving you, or other employees, workers, directors and consultants, including accidents at work;
  - For the purposes of ensuring the security of our systems and our information, to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
  - To facilitate the use of our IT systems and monitor your use of our information and communication systems to ensure compliance with our IT policies;
  - To comply with our legal obligations, for example in relation to PAYE, National Insurance, Companies House filings;
  - For the purposes of equal opportunities monitoring;
  - Storage of records relating to you and also records relating to our business;
  - For the purpose of complying with any regulatory requirements.

### **Members of the Association**

- To administer the membership account you have with us and manage our relationship with you; and dealing with payments and any support, service or product enquiries made by you;
- To arrange and manage any contracts for the provision of products, accreditations and/or services;
- To send you information which is included within your membership benefits package, including news, relevant updates related to sport and exercise science and details about events, partner offers and discounts;
- 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 partners;





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- To answer your queries or complaints;
- Retention of records;
- To conduct data analytics studies to better understand the needs of our members'
- For the purposes of promoting our events and membership packages;
- To comply with health and safety requirements.

### **Third parties**

- To send you information for which you have indicated an interest in receiving (and for which you have provided consent), including news, information about membership, relevant updates related to sport and exercise science and details about events, partner offers and discounts;
- To arrange, manage and contact you about any BASES events that you have registered to attend
- To conduct data analytics studies to better understand the needs of sport and exercise scientists
- For the purposes of promoting our events and membership packages;
- To comply with health and safety requirements.

### **Where do we store and process personal data?**

Personal data provided by employees, members and third parties is stored and processed in either

- Workbooks: BASES customer relationship management (CRM) system. Workbooks is an established CRM provider and has strong processes and procedures in place to protect all data, including personal data.
- Private Network: Employee and member personal data may also be stored and processed in documents held on BASES private computer network. This network can only be accessed by members of BASES staff.

### **Who do we share personal data with?**

BASES will occasionally share members' personal information (e.g., name, contact details) with partner organisations, where this is required to provide products and services purchased by members or included in the membership contract. For example, if you register for a BASES event, we may need to share your contact details with the organisation delivering and/or hosting the event to provide important event details. We do this so in order to provide the best possible service to our members and will only ever share information which is required in order to deliver BASES products and services.

BASES will not share any personal information of employees, members or third parties with any other person or organisation for marketing or promotional purposes, unless explicit consent is first provided.

Due to the nature of the membership organisation, personal information of members may be accessed by the following, where required in the administering of membership products and services:

- BASES staff members
- Volunteers (BASES members) working on behalf of BASES

## How long do we keep personal data for?

### Employees

BASES will hold employee records (excluding payroll and PAYE data which will be erased immediately) for six years after an employee has ceased employment with the organisation. This is based on the legal obligations should a terminated employee bring a claim against the organisation.

### Members of the Association

BASES will hold member records for up to three years after a member has ceased their membership with the organisation (unless consent is provided to retain the record as a third party – see below). We retain data for this period due to the high levels of member re-engagement we experience as an organisation and because we believe there is a high likelihood that, as a past member, you will continue to be interested in relevant news, updates and new products and services that we offer.

After three years, individuals will be contacted to ask if they consent to their personal information being held for another three years and to ensure our records are up to date. If explicit 'opt-in' consent is not provided, the member record will be permanently removed from the BASES database.

### Third parties

BASES will hold personal information of third parties for a maximum of three years from the last date when an individual actively engages with us. After three years, the individual will be contacted to ask if they consent to their personal information being held for another three years and if they want to continue receiving the news/updates/communications they originally consented to. If consent is not provided, the third-party record will be permanently removed from BASES database.

## Individuals' rights

BASES respects individuals' rights to accessing, rectifying and removing personal data which is held by us. Any written or electronic (received by e-mail) request will be dealt with by the data protection officer (DPO), in line with our data processing processes. We aim to respond to all requests within 10 working days of receiving a request. This covers any request by a member of staff, member of the Association or third party:

- to access personal information
- to delete/erase/dispose of personal data
- to provide data electronically (data portability)
- to rectify personal data



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## Subject access requests

Subject access requests allow an individual to request the following information from a data controller that holds personal information about that individual:

- told whether any personal data is being processed;
- a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- a copy of the information comprising the data; and given details of the source of the data (where this is available)

BASES will comply with any written subject access request in a reasonable and timely manner and within no more than 40 calendar days of receiving the request.

A subject access request will incur a small administration fee covering the administrative costs of processing the request.

## Data breaches

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed. While we do everything that we can to keep personal data safe and secure, we also have a policy and processes in place in case a data breach does occur.

In the event of a data breach, we will:

- report the breach to the relevant Data Protection Authority (DPA) within 72 hours
- inform any individual affected by the data breach “without undue delay”

## Privacy Notices

A privacy notice is a statement that describes how an organisation collects, uses, retains and discloses personal information. Different organisations sometimes use different terms and it can be referred to as a privacy statement, a fair processing notice or a privacy policy.

To ensure that BASES processes personal data fairly and lawfully, we are committed to informing all parties for whom we process personal data:

- Why we need your data
- How it will be used
- Who it will be shared with

The information in our privacy notices also explains what rights individuals have to control how we use their information.

### Privacy Notice for BASES Employees – Appendix 1

### Privacy Notice for Members of the Association – Appendix 2

## Appendix 1 - Privacy Notice for BASES Employees

### Introduction

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your working relationship with us. This notice explains how we comply with the law on data protection and what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

This notice applies to our current and former employees, workers, directors, and consultants. This notice does not form part of any contract of employment or other contract to provide services.

References to **we**, **our** or **us** in this privacy notice are references to the **British Association of Sport and Exercise Sciences (BASES)**.

We have appointed a Data Protection Officer (DPO) to oversee our compliance with data protection laws, however, the BASES Board of Directors has overall responsibility for data protection compliance in our organisation.

### Personal information we may collect from you

When you interact with us in relation to your work with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details such as name, title, addresses, telephone numbers, and personal email addresses and emergency contact details;
- date of birth;
- gender;
- marital status;
- referee details, next of kin and emergency contacts;
- national insurance number and other tax or governmental identifiers;
- bank accounts, payroll and tax status
- salary, insurance, annual leave, pension, benefit entitlement and expenses;
- start date and leaving date;
- location of employment or workplace;
- attendance history;
- identification documents and information, such as passport;
- recruitment (including copies of right to work documentation, past employment history, references and other information included in a CV or cover letter or as part of the application process);
- employment records and notes (including job titles, work history, working hours, training records, professional memberships, maternity, parental and compassionate leave and details of any home-working assessment for health and safety purposes) and education and professional records/qualifications;
- performance data including that generated through our appraisal systems;
- disciplinary and grievance information;
- use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- images in video and/or photographic form and voice recordings;
- records of enquiries and other correspondence with you.



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## Special categories of personal information

Previously known as sensitive personal data, special categories of personal data is data about an individual which is more sensitive, thus requiring more protection. The special categories include information about an individual's:

- race
- sex
- gender
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sexual orientation

BASES may undertake surveys to determine whether our equity, diversity and inclusion policies are fair and effective; to understand our member demographic and to determine whether any actions need to be undertaken to rectify any issues with representation and/or member opportunities. We do this by analysing the information that is provided to us in an anonymous, de-personalised and aggregated format. This information is collected during membership registration and membership renewal. All special categories of personal sensitive information are subject to enhanced protection and safeguarding, including controlling who can access it, encryption, and physical security measures.

## Where we collect your information

We typically collect personal information about employees, workers, directors and consultants through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, credit reference agencies or other background check agencies. We will also collect additional personal information in the course of job-related activities throughout the period of you working for us.

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.

## Uses made of the information

The table overpage 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.





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<b>Purpose</b>	<b>Personal information used</b>	<b>Lawful basis</b>
<b>Non- 'special categories' of Personal Information</b>		
<b>Making a decision about your recruitment or appointment and managing the recruitment process and determining the terms on which you work for us</b>	All the personal information we collect for the purposes of the recruitment process	We need this information to be able to perform and administer the recruitment process for you to engage you This is necessary to enter into a contract with you
<b>Checking you are legally entitled to work in the UK</b>	Personal contact details and identification documents and right to work documentation	We have a legal obligation to do so.
<b>Producing and maintaining business records, staff directories, intranets, websites, brochures and other internal and external business documentation and materials</b>	Personal contact details, location of employment or workplace and employment records	We have a legitimate interest to maintain up to date business records and materials.
<b>Paying you and, if you are an employee, deducting tax and National Insurance contributions</b>	Personal identifiers and transaction and payment information	To be able to manage and perform our contract with you We have a legal obligation to do so
<b>Providing benefits of employment or working, including flexible benefits and liaising with benefit providers</b>	Personal identifiers, salary, annual leave, pension and benefits entitlement, transaction and payment information	To be able to manage and perform our contract with you We may have a legal obligation to do so
<b>Administering the contract we have entered into with you</b>	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you
<b>Conducting performance reviews, grievance or disciplinary hearings, managing performance and determining performance requirements and making decisions about compensation and benefits,</b>	Performance, disciplinary and grievance information, employment records, compensation history, salary, annual leave, pension and benefits	We have a legitimate interest to ensure that our workers are meeting their performance objectives and that the business is managing and controlling the performance process effectively To be able to manage and perform our contract with you
<b>Business management and planning, including accounting and auditing, conducting our normal business operations and managing our relationship with you</b>	All your personal information excluding 'special categories' of personal information and criminal records information	To be able to manage and perform our contract with you. We have a legitimate interest to run and manage our business



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<p><b>Assessing qualifications for a particular job or task, including decisions about promotions and ascertaining your fitness to work, education, training and development requirements</b></p>	<p>Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annualleave, pension and benefits and other personal information excluding 'special categories' of personal information and criminal records information</p>	<p>We may be legally obliged to do so To be able to manage and perform our contract with you We have a legitimate interest to run and manage our business and to ensure that our workers are suitably trained</p>
<p><b>Making decisions about your continued employment or engagement or termination of our working relationship</b></p>	<p>Personal identifiers, performance, disciplinary and grievance information, employment records, compensation history, salary, annualleave, pension and benefits</p>	<p>We have a legitimate interest to ensure that the workers we engagecontinue to be suitably qualified and/or appropriate for their role within the business</p>
<p><b>Managing sickness absence</b></p>	<p>Personal identifiers, attendance history and performance</p>	<p>To be able to manage and perform our contract with you We have a legitimate business interest to ensure that the workers we engage continue to be suitably qualified and/or appropriate for their role within the business</p>
<p><b>Complying with health and safety obligations</b></p>	<p>Personal identifiers and other information obtained through electronic means such as swipecard and key fob records, working environment information including any home-working assessment records</p>	<p>We have a legal obligation to comply with Health and Safety laws We also have a legal obligation to report any accidents at work in accordance with health and safetylaws</p>
<p><b>Dealing with legal disputes involving you, or other employees, workers, directors and consultants, including accidents at work</b></p>	<p>All your personal information excluding 'special categories' of personal information and criminal records information</p>	<p>To be able to manage and perform our contract with you We have a legitimate interest to ensure that all legal claims are managed effectively</p>
<p><b>For the purposes of ensuring the security of our systems and our information, to ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution</b></p>	<p>Use of our information and communications systems, including the computers and fixed and mobilephones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information</p>	<p>We have a legitimate business in ensuring our systems are secure To be able to manage and perform our contract with you</p>
<p><b>To facilitate the use of our IT systems and monitor your useof our information and communication systems to ensure compliance with our IT policies</b></p>	<p>Use of our information and communications systems, including the computers and fixed and mobilephones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information</p>	<p>We have a legitimate interest in ensuring that our workers use our computer systems and information correctly and efficiently and in compliance with our IT policies To be able to manage and perform our contract with you</p>



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<b>To comply with our legal obligations, for example in relation to PAYE, National Insurance, Companies House filings</b>	Personal identifiers, transaction and payment information, national insurance number and other tax or governmental identifiers bank account details, payroll and tax status, name, address, date of birth, other directorships	We have a legal obligation to do so
<b>To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution</b>	Use of our information and communications systems, including the computers and fixed and mobile phones that we allow you to use, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information	We have a legitimate interest in ensuring our systems are secure
<b>To conduct data analytics studies to review and better understand employee retention and attrition rates</b>	Employment records	We have a legitimate interest in order to improve as an employer
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth; gender; marital status; salary, annual leave, pension and benefits; location of employment or workplace	We may have a legal obligation to do so and we have a legitimate interest in doing so to make sure our business is a fair place to work
<b>Storage of records relating to you and also records relating to our business</b>	All non-'special categories' of personal information	To be able to manage and fulfil our contract with you, we may have a legal obligation to do so and we also have a legitimate interest to keep proper records
<b>For the purpose of complying with any regulatory requirements</b>	All the personal information about you excluding special category information and criminal records data	We may have a legal obligation to comply with regulatory requirements and we have a legitimate interest in complying with regulatory requirements

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 engage you 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 engagement. 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 to properly 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 described in the "Contacting 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 benefits to you.



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## Disclosure of your personal information

We share personal information with the following parties:

- **Any party approved by you.**
- **Other service providers to our business and advisors:** for example, payroll, pension administration, benefits provision, professional advisors and administration, CCTV contractors and IT services. All our third-party service providers and other entities in the group are required to take appropriate security measures to protect your personal information.
- **Purchasers of our business:** buyers or perspective buyers who we sell or negotiate to sell our business to.
- **Prospective new employers:** for the provision of references for you;
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives for the financial services industry, including but not limited to the [Financial Conduct Authority and Prudential Regulation Authority.]
- **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.

## How long do we keep personal information for?

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 commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period of 6 years after your last contact with us. Exceptions to this rule are:

- Details regarding unsuccessful job applicants where we hold records for a period of not more than 12 months;
- Information that may be useful to a pension provider or benefit provider which we may retain for the period that your pension or benefit is payable.
- Information that may be relevant to 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 might not start to run until a long time after you have worked for us.

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 phone number or email address.

## Your rights in relation to 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.





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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 "**Contacting 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.

### **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.

### **Contacting us**

In the event of any query or complaint in connection with the information we hold about you, please email [enquiries@bases.org.uk](mailto:enquiries@bases.org.uk) or write to us at:

#### **BASES**

The British Association of Sport and Exercise Sciences (BASES)  
Rooms G07 and G08 Fairfax Hall  
Leeds Beckett University  
Headingley Campus  
Headingley  
Leeds LS6 3QT

**Version dated 16 May 2018**

**Updated 2 December 2021**



## Appendix 2 - Privacy Notice for Members of the Association

### Introduction

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

This notice applies to you if you are either:

1. An individual who has registered for BASES membership to access the membership products and services we offer; or
2. An individual who has signed up to receive updates from BASES about news, upcoming events and offers

References to **we, our or us** in this privacy notice are references to the **British Association of Sport and Exercise Sciences (BASES)**.

We have appointed a Data Protection Officer (DPO) to oversee our compliance with data protection laws, however, the BASES Board of Directors has overall responsibility for data protection compliance in our organisation.

### Personal information we may collect from you

When you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- your occupation status, job role and employer
- details/copies of your qualifications and academic certificates (for accreditations)
- 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;
- records of your attendance at any events hosted by us or our partners;
- records of any roles you have undertaken or positions you have held within our organisation
- your communication and subscription preferences
- any data submitted by you as part of an application for any accreditation, certification, award or grant administered by us;



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## Special categories of personal information

Previously known as sensitive personal data, special categories of personal data is data about an individual which is more sensitive, thus requiring more protection. The special categories include information about an individual's:

- race
- sex
- gender
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sexual orientation

BASES may undertake surveys to determine whether our equity, diversity and inclusion policies are fair and effective; to understand our member demographic and to determine whether any actions need to be undertaken to rectify any issues with representation and/or member opportunities. We do this by analysing the information that is provided to us in an anonymous, de-personalised and aggregated format. This information is collected during membership registration and membership renewal. All special categories of personal sensitive information are subject to enhanced protection and safeguarding, including controlling who can access it, encryption, and physical security measures.

## Where we collect your information

We typically collect personal information about our members when you register to become a member of BASES, when registering to purchase any services or products we offer, when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

Additional information is collected during membership based on a member's level of engagement and whether a member chooses to fulfil any role for the organisation, attend an event, or apply for any accreditations, awards or grants.

## 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</b>		
<b>To administer any membership account(s) you have with us and managing our relationship with you 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 properly manage and administer your membership contract with us.
<b>To arrange and manage any contracts for the provision of any products and/or services.</b>	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of products and services.



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<b>To send you information which is included within your membership benefits package, including details about events, products, offers and discounts.</b>	All contact and membership details	This is necessary to enable us to properly 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 and participation products</b>	All contact and membership details and marketing preferences	This is either necessary to enable us to properly manage and administer your membership contract with us or where you have given us your explicit consent to do so.
<b>To answer your queries 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.
<b>Retention of records</b>	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records.
<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 our membership.</b>	All the personal information we collect and records of your engagement with the organisation.	Where you have given us your explicit consent to do so.
<b>For the purposes of promoting 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</b>	Records of attendance	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 with you.

For some of your personal information you will have a legal, contractual, or other requirement or obligation 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 position as a member. 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 to properly 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.



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Please note 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.

## Direct Marketing

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

We will only send marketing messages to you in accordance with the marketing preferences you set. You can let us know at any time that you do not wish to receive marketing messages. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

## Disclosure of your personal information

We share personal information with the following parties:

- **Any party approved by you.**
- **Other service providers:** for example, payment processors, contractors or suppliers and IT services (including CRM, website, video- and teleconference services);
- **Our supply chain partners & sub-contractors**, such as couriers, event organisers etc;
- **Our Commercial Partners:** for the purposes of providing you with information on any special offers, opportunities, products and services and other commercial benefits provided by our commercial partners where you have given your express for us to do so ;
- **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.

## How long do we keep personal information for?

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 commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period 3 years after your last contact with us. Exceptions to this rule are:

- Information that may be relevant to 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 might not start to run until a long time after you have worked for us.

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 phone number or email address.

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- 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.

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