

# PODIUM ANALYTICS - GENERAL WEBSITE PRIVACY POLICY

Version 3.0 – March 2023



**FOR A SAFER  
WORLD OF SPORT**

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## 1 INTRODUCTION

Podium will be working closely with schools, sports clubs, national governing bodies and other organisations to provide tools, conduct research and apply the outcomes of that research for the benefit of those playing sport, in particular between the ages of 11 and 18.

Information on how we process personal data can be found in our privacy notice below.

## 2 PRIVACY NOTICE

Podium Analytics (“Podium”, “we”, “us” or “our”) is a company limited by guarantee registered in England and Wales (company number 11831773) and a registered charity in England and Wales (charity number 1183716), having its registered office at 6 Grosvenor Street, London W1K 4PZ.

This privacy notice explains how Podium uses and protects your personal data, as well as your rights in respect of it, how to exercise your rights and how to contact us.

Detailed information about the personal information we obtain, where we get it from, why we use it and who we may share it with, the legal basis on which we use it, where personal data will be held and details of how long we will keep it for, is set out in the Specific Privacy Notice that we provide to you when we obtain personal data.

For website users, if you are merely browsing our websites and not providing any other personal data to us, instead of a Specific Privacy Notice, all of the privacy information is in this privacy notice and the cookie notice on our website.

Please note, the Podium websites and our other services may contain links to other websites that are not controlled by us, or our service providers. These links are provided for your convenience or information. We are only responsible for our own privacy practices and security of our systems and websites. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

## 3 OUR RELATIONSHIP WITH YOU

Podium operates in many capacities, for example:

- As an employer
- As a website operator
- As a research organisation
- As a provider of health and wellbeing-related applications, technologies and products
- As a provider of resources for sports-related training and education
- As a customer of other organisations that provide services to us, such as our data platform technology provider

In this privacy notice, all of the ways we know you are together referred to as 'Our Relationship'.

## 4 DATA PROTECTION COMPLIANCE

Unless we say otherwise in a Privacy Notice provided to you when we collected your data (the “Specific Privacy Notice”), Podium is the data controller in respect of all personal data we obtain whether that is from Podium’s websites or as a result of Our Relationship with you. This means we are responsible for ensuring that we do so in full compliance with the UK enactment of the EU General Data Protection Regulation 2016/679 implemented under Section 3 of the European Union (Withdrawal) Act 2018 (UK GDPR), the Data Protection Act 2018 and other related privacy laws.

It is important that you understand and are comfortable with all privacy terms before using our websites and/or participating in Podium activities.

## 5 THE TYPES OF INFORMATION WE COLLECT

The information we obtain about you and its sources will depend on the nature of Our Relationship. Specific detail will be in the Privacy Notice that applies to Our Relationship but as an example, the categories of personal information we may process includes:

- Personal identifiers (such as name, date of birth, contact details, accreditations, qualifications and other identifiers collected through our website and apps)
- Characteristics (such as gender, nationality, ethnicity, and language)
- Details of any devices you have used to interact with us (such as IP address and cookies)
- Location information
- Details of Podium products and services you have expressed an interest in
- Organisations (such as schools and sports organisations you have a relationship with)
- Medical information (such as doctor's information, physical and mental health, injury diagnosis, medication, dietary information and disability)
- Audio and visual media (including audio, images and videos)
- Feedback and survey responses
- Your direct marketing preferences
- Records of your interactions with us, such as telephone conversations, emails and other correspondence
- Details of any consents you have given
- Supporting information that is relevant to Our Relationship

## 6 HOW WE COLLECT YOUR INFORMATION

We obtain information from a wide variety of sources depending on the nature of Our Relationship.

Specific detail will be in one of the Privacy Notices that applies to our relationship but in general, we may obtain information:

- Directly from you
- From other information we already hold as a result of Our Relationship
- From any device you use to communicate with us such as when accessing Podium's websites or apps, from telephone conversations, emails and written and verbal communications including blogs and social media interactions
- From records of the goods or services provided to you. Some of this information may be obtained from the service providers
- From schools, sports clubs and other individuals and organisations involved in Podium's sports injury research programmes
- From third party data providers

We may supplement the information that you provide with other information that we obtain from our dealings with you (such as events you or someone you book for has attended, and details from other Podium services) or which we receive from other organisations, such as other sports organisations or commercial partners.

We may monitor or record telephone calls for security purposes and to improve the quality of the services we provide to you. We will give prior notice of the monitoring or recording to you.

### 6.1 Apps, IP Addresses, Cookies and Tracking Tools

In order to enable the Podium apps to function and to help with analytics, the app functionality may mean we get some information that privacy laws designate as personal data. This includes details of the app that has been

downloaded and may include the age range of the user, their country of residence, the brand of the device used, the type, model, operating system and internet browser of the device that the app has been downloaded to, user gender, interests (such as arts and entertainment, sport) and when the user firsts opens the app. Analytics also automatically generates a unique identifier for each downloaded copy of the app to compute user metrics. This is known as an 'app instance identifier'.

Podium's apps do not normally include an option for in-app purchases.

If you download a Podium app that involves us processing more clearly identifiable personal data or includes tracking for in-app purchases, Podium will ensure you are provided with a Specific Privacy Notice to ensure you have the relevant privacy information.

Please note the app store you use to download the app may also obtain and process personal data about you and your choice/use of apps. We are only responsible for our own privacy practices and the security of our systems. We recommend that you check the privacy and security policies and procedures of each app store you use to download apps.

## 6.2 IP Addresses

interested in, we may collect your Internet Protocol addresses (also known as IP addresses) and Mac addresses if applicable. Your IP and/or Mac address is a unique address that computer devices (such as PCs, Macs, tablets and smartphones) use to identify themselves and in order to communicate with other devices in the network.

## 6.3 Cookies

In common with many other website operators, we may use standard technology called 'cookies' on Podium's websites. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate Podium websites on each visit.

Our cookies are used to enable us to develop the Podium websites and to enable you to properly navigate them. We use cookies to collect personal data to enable us to reflect our users' interests and by noting who has seen which pages, properties and advertisements (including 'click throughs' from emails), how frequently particular pages are visited and to enable us to determine the most popular areas of the Podium websites. We may use cookies to enrich your experience of using Podium's websites by allowing us to tailor what you see to what we have learned about your preferences during your visits to our sites. Sometimes we may use services of third parties and they may use cookies on our behalf in order to provide their services.

The cookies we use can be found in the Cookie Notice on each of the Podium websites that you visit. You will see these as a 'pop-up' the first time you use the website and again if you use our website after having deleted our cookies for that website.

## 6.4 Preventing Use of Cookies

Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies being stored. With experience, you can usually choose to switch off all cookies or to allow only certain 'trusted' sites to place cookies. For further information on cookies and Flash cookies see the Information Commissioner's website at [www.ico.org.uk](http://www.ico.org.uk).

## 6.5 Tracking Technology

Occasionally, we may use digital tracking (usually in a cookie) on Podium websites or in emails we send to you. We use these to ensure you receive appropriate information and do not receive multiple communications about the same thing.

## 6.6 Preventing Use of Tracking Technologies

If you stop cookies, this will normally stop any tracking from the website. Where we plan to use tracking technology, we will ask for your consent.

## 7 HOW WE USE YOUR INFORMATION

All personal data that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection legislation, any applicable terms of use, the Specific Privacy Notice and this privacy notice and any consents or other arrangements agreed with you (or those other persons) or on your/their behalf.

Typically, we use personal data for:

- Administration
- Registration and general administration (including verification and security checking), creating and administering login credentials and access controls for online services
- Communication – to communicate with you
- Compliance – to comply with our legal responsibilities
- Safety and safeguarding – to ensure a safe environment to work in and participate in Podium activities
- Records – for record-keeping purposes
- Research – to undertake research into injury in sport
- Service development – to improve the delivery and impact of our services and programmes
- Social inclusion – to keep under review equal opportunities within Podium and/or ethnicity information to enable us to monitor and ensure compliance with anti-discrimination policies
- CCTV – to prevent and detect unlawful activity at our premises
- Analysis – to track and analyse activity on Podium websites and to understand the interests and views of those involved in our activities

### 7.1 High Net Worth Individuals

We carry out research in order to engage with high-net worth individuals to help us identify those who have an interest in our cause and could support our work through donations.

We research potential high-net worth individuals because it enables us to create tailored requests and to focus our fundraising resources. This approach helps us to provide the best possible experience that is aligned with an individual's interests and capacity to donate.

We identify potential high value donors by:

- Asking our existing high net worth individuals to donate again.
- Researching new high net worth individuals who have not given to us, but who may have a connection to our work and have the capacity to give.
- Asking our donors, Trustees, and influencers to open up their networks to us.
- Asking our donors, Trustees, and influencers to introduce us to potential donors that they have a link to.

We will on our own, or via a third-party data processor, create a research profile of the individual using publicly available information and this will be used by our fundraising teams to create a tailored approach when contacting those individuals.

Where we receive large gifts or donations, we may conduct due-diligence on an individual and the source of the funds to ensure it meets our legal obligations and internal policies.

We rely on legitimate as our lawful basis for identifying, researching, and otherwise processing the personal data of our potential high-net worth individual donors as set out above.

*If you would prefer us not to profile you as explained below, please see the Your Rights section below.*

### 7.2 Lawful Basis

Podium relies on a number of legal bases to collect, use, share and otherwise process the information we have about you depending on the type of information, the purpose for which we use it and the nature of Our Relationship. This includes, for example, lawful bases which enable us to comply with our legal responsibilities (for example a contract we have with you or which law imposes on us) or for establishing and dealing with any legal claims, or explicit consent.

## 8 HOW WE SHARE YOUR INFORMATION

We may, occasionally, appoint other organisations to carry out some of the data processing activities on our behalf. These may include technology hosts and other service providers. In these circumstances, we will ensure that personal data is properly protected and that it is only used in accordance with this privacy notice.

Where personal data has been anonymised such that it no longer contains any personal data (“Anonymised Data”), Podium may use and share the Anonymised Data for any purpose. The Anonymised Data may be retained by Podium for an indefinite period.

Podium will never sell any personal information to third parties.

Your data will be stored within the United Kingdom or the European Economic Area. We do not transfer personal data outside of the United Kingdom or the European Economic Area other than, potentially, to a few of our service providers in other parts of the world in accordance with transfer and processing agreements. Wherever we need to transfer your personal data outside of the United Kingdom, we will take proper steps to require that those third-parties protect your data in accordance with this privacy notice and applicable data protection legislation.