

## **Podium Sports Injury Research Programme Privacy Notice**

### **1. Introduction**

Podium Analytics (“Podium”, “we”, “our”, or “us”) is a charitable company registered in England and Wales with charity number 1183716, having its registered office at 6 Grosvenor Street, London W1K 4PZ. As a non-governmental organisation which exists to support the prevention of sports injuries, Podium has a vision to create a safer world of sport, ensuring more people can play sport for longer, and has a clear mission to significantly reduce the incidence and impact of injury in sport.

Podium requires valid, reliable and complete data on youth sports injury, illness, wellness and exposure in order to tackle the root cause of injury in youth sports. To effect change, Podium has partnered with the University of Oxford to create the Podium Analytics Institute for Youth Sports Medicine and Technology which will undertake research into injury within sport, with an initial focus on young people aged between 11 and 18 years old in the UK.

Your privacy is extremely important to Podium, and we are fully committed to providing you with clear and transparent information about how we use your personal information. We value the trust you give us when sharing your personal information. We will ensure robust measures are in place to keep your information secure and will only use it for the purposes outlined in this privacy notice.

### **2. Who does this privacy notice apply to?**

This privacy notice applies to individuals who participate in our sports injury research programmes (“you”) and your parents/guardians where applicable. It also applies to your use of our Platform through which we collect and process your personal information.

It tells you what you can expect when Podium collects personal information from you when you participate in our sports injury research programmes (“our Programmes”) including how personal data will be processed, the third parties to whom it may be passed, the other data controllers with whom data is shared and how long Podium will retain the data. In addition, it explains your rights and responsibilities in respect of the data and how you can opt out of aspects of the processing, where applicable.

Podium is a data controller and is responsible for ensuring its processing of your data complies with applicable data protection legislation, including the Data Protection Act 2018 and the UK enactment of the EU General Data Protection Regulation 2016/679 implemented under section 3 of the European Union (Withdrawal) Act 2018 (the “UK GDPR”).

### **3. What type of personal data does Podium process?**

We process data about you when you participate in our Programmes. The categories of personal information that we may collect, store and share includes:

- Personal identifiers (such as name, date of birth, contact details and other identifiers collected through the Platform)
- Characteristics (such as gender, ethnicity, and language)
- Medical information (such as doctor’s information, physical and mental health, injury diagnosis, medication, dietary information and disability)
- Attendance information (such as sport sessions and matches attended)
- Organisations (such as name of school or sports clubs attended)

- Location (such as where sporting activity takes place)
- Details of any devices you have used to interact with us (such as IP address and cookies)
- Audio and visual media (including audio, images and videos)

#### 4. How will Podium use the data?

We will use this data to:

- Analyse sports injuries, treatment, rehabilitation and recovery
- Conduct research on sports injuries and treatment programmes in children and young adults
- Develop sports related products, treatments, therapies and rehabilitation and training programmes
- Assess and improve the quality of our services

#### 5. What is the lawful basis for collecting this data?

Every instance of processing personal data under the UK GDPR requires a 'lawful basis'.

The lawful basis of processing personal data described in this privacy notice is:

**Article 6(1)(a) Consent** – you give your clear and informed consent for Podium to process your personal data through signing the consent form (either online or physically) prior to your data being processed for the purposes in this privacy notice. If, in the future, Podium processes your data for any new purpose then your consent for the new purpose will be obtained at the time.

Where Podium processes sensitive data, such as your health or medical data (which is defined as “special category” personal data under UK GDPR), it will require another basis for processing under Article 9 of the UK GDPR in addition to the basis given above. For special category data processed as described in this privacy notice, the basis for processing is:

**Article 9(2)(a) Explicit consent** – where you have given ‘explicit consent’ to the processing of personal data for one or more specified purpose, such as the explicit consent you provide to participate in our Programmes, which is obtained by asking you to read and accept the terms of this privacy notice.

We will require your parent/guardian’s consent for us to process your data. If you are a parent or guardian and you are aware that your child has provided us with personal data without your consent, please contact us. If we become aware that we have collected personal data from any child without verification of parental/guardian consent, we will take steps to remove that information from our systems.

#### 6. How is the data collected?

Podium collects personal data when you consent to participating in our Programmes and throughout the duration of your interaction with those Programmes.

The data may be provided to us by your school and/or your sports clubs, as well as directly from you and your parents/guardians. Information may also be collected through other technologies such as wearable devices, video cameras and other equipment and third-party apps. Where artificial intelligence is used to process data, this will be solely for the purposes set out in this privacy notice and not for automated decision making or profiling about you.

## **7. How is the data stored?**

Podium maintains a high standard of security of its data collection platform and associated technologies and takes all reasonable measures to hold any personal data securely. We have implemented robust physical controls and electronic safeguards, and have in place internal policies and controls, to prevent unauthorised disclosure or access to your information and to ensure that your data is not lost, accidentally destroyed or misused.

Podium operates a 'privacy by design' approach. This means that privacy and the protection of individuals' data is considered from the initial design, and through all areas of development, of Podium's data collection platform to ensure the highest standards of privacy and security.

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.

## **8. How long is the data stored for?**

We will only retain your personal data while you remain actively engaged in our Programmes, or if you give us your consent to hold it for another purpose. Personal data will be deleted, or anonymised so that it is no longer personally identifiable data, 3 years following the last activity in the Podium platform with respect to the individual.

Personal data may be retained for longer if required in accordance with any statutory or professional retention periods applicable to the School or Podium.

## **9. Sharing your personal data**

We do not share personal information about you to any third party without your consent, unless the law and our policies allow us to do so. Where you have provided your consent, we may share your personal information with such third parties as:

- Your school and/or sports clubs you are a member of which participate in our Programmes
- Governing and representative bodies of sport and recreation

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 (the "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. All data provided to the Podium Analytics Institute for Youth Sports Medicine and Technology will be anonymised.

Podium will never sell any personal information to third parties.

## 10. Your rights

You have a number of legal rights in respect of your data. Given the nature of the personal data that is collected, stored, analysed and shared as described in this privacy notice, we have determined that a parent/guardian can exercise these rights on your behalf. Even if your parent/guardian has given consent to the collection, storage, analysis and sharing of your personal data, you can also exercise these rights when you reach your 13<sup>th</sup> birthday if you are competent to do so as far as the law is concerned. Your rights include:

**Right to be informed about how your information is processed:** We hope the information in this privacy notice has informed you as to how we process your personal data but please contact us if there is any additional information you require (see 'How to contact us' below).

**Right to access any personal data held about you:** You have the right to see the personal information we hold about you. This is called a Data Subject Access Request. You can request a copy of any personal information that we hold about you by contacting us in writing (see 'How to contact us' below). The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof of authority if the request comes from someone other than the person whose data we are asked to provide. This will ensure we only provide information to the correct person. Under the UK GDPR, Podium is required to respond to your request within one month.

**Right to withdraw consent:** Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This does not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact us (see 'How to contact us' below).

**Right to have your data rectified if it is inaccurate:** If we do hold information about you, you can ask us to correct or amend any inaccurate or incomplete information by contacting us in writing at the address below. We will either make the requested amendments or provide an explanation as to why we are not making the changes.

**Right to have your data erased (except if there is a valid lawful reason to retain it):** You have the right to request the deletion of your information in advance of our standard retention periods. We will delete or anonymise this information such that it is no longer personally identifiable information unless there is a lawful reason for the information to be retained.

**Right to have your information restricted or blocked from processing:** If you object to processing, we will restrict the processing of your information for the purpose to which you are objecting whilst we review your objection.

**Right of portability of your personal data:** Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to another organisation.

**Right to object to the processing of your personal data:** You have the right to object to our processing of your personal data in certain circumstances depending on the purpose of processing the data and on the lawful basis for processing.

**Right to complain:** See section 11 below.



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

## 11. Complaints

If you have any concerns or complaints about how we are handling your personal data, we would prefer you to get in touch with us directly so that we can try to resolve the issue (see 'How to contact us' below).

You can also contact the Information Commissioner's Office if you are unhappy with how we have used your data at [www.ico.org.uk](http://www.ico.org.uk) or at the following address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113

## 12. How to contact us

For further information, you can contact us by:

Write to us: Data Protection Officer, Podium Analytics, 6 Grosvenor Street, London W1K 4PZ

Call us: +44 (0)20 3862 7283

Email us: [dataprotection@podiumanalytics.org](mailto:dataprotection@podiumanalytics.org)

Podium Analytics is registered as a Data Controller with the Information Commissioner's Office – registration number: ZA703878.