



## Brackley Gymnastics School

### Privacy Notice & Data Protection Statement

Version	Date	Authorised by	Changes made
V1	16/03/2026	Natalie Baker – Club Director	Launch

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#### Linked Documents

Brackley Gymnastics School – Gymnasts’ Code of Conduct  
Brackley Gymnastics School – Photography & Filming Policy  
Brackley Gymnastics School – Whistleblowing Policy  
Brackley Gymnastics School – Complaints Policy (Members & Visitors)  
Brackley Gymnastics School – Anti-Bullying & Harassment Policy  
Brackley Gymnastics School – Parents, Carers & Guests Code of Conduct  
Brackley Gymnastics School – Child Protection Policy  
Brackley Gymnastics School – Safeguarding Adults at Risk Policy  
Brackley Gymnastics School – Equality, Diversity & Inclusion Policy  
Brackley Gymnastics School – Safer Recruitment Policy  
Brackley Gymnastics School – Terms & Conditions

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#### 1. Purpose of this Notice

Brackley Gymnastics School (BGS) is committed to protecting the privacy and personal data of everyone involved in our activities.

This Privacy Notice explains how we collect, use, store, and protect personal information in line with UK data-protection law, our insurance and safeguarding requirements, and the standards set by our governing and accrediting organisations.

We handle personal data fairly, lawfully, transparently, and securely — and only where it is necessary and safe to do so to support our operations, welfare duties, and legal obligations.

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#### 2. Who We Are

Brackley Gymnastics School Ltd is a not-for-profit organisation (Company No. 16732545) providing gymnastics instruction, events, and club activities for children and young people.

For data-protection purposes, BGS is the Data Controller responsible for determining how personal information is processed.

Brackley Gymnastics School Ltd is registered with the Information Commissioner’s Office (ICO) as a data controller under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

ICO Registration Number: ZC057100

Contact for all data or privacy queries:

Email: [brackleygymnastics@gmail.com](mailto:brackleygymnastics@gmail.com) or [bgs.welfare@gmail.com](mailto:bgs.welfare@gmail.com)

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#### 3. Information We Collect

We collect only the data required to operate safely and effectively, which may include:

- Participant details – name, date of birth, emergency contact details, relevant medical information (such as injuries, allergies, asthma, or medical conditions), and any accessibility or inclusion needs.
- Parent/guardian contact details – name, phone number, and email address.
- Session records – attendance, progress notes, awards, and safeguarding logs.
- Imagery – photographs or videos taken in line with the BGS Photography & Filming Policy.
- Staff and volunteer contact and qualification details (where relevant).
- Communications – messages or correspondence sent to the club.

We do not collect unnecessary personal data or store data beyond our operational needs.

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#### 4. Why We Collect Personal Data

Personal data is used for:

- Safeguarding and welfare management.
- Registering and communicating with members and parents/carers.
- Delivering and monitoring gymnastics sessions.
- Emergency contact or medical purposes.
- Managing membership, fees, and insurance compliance.
- Confirming consent for photography, media, or event participation in accordance with the BGS Photography & Filming Policy.
- Responding to complaints, incidents, or regulatory enquiries.
- Protecting the operational integrity of BGS by ensuring data is used only for legitimate club purposes and not misused, copied, or distributed without authorisation.

Personal data will only be processed where it is necessary to support club activities, safeguarding responsibilities, legal obligations, or legitimate operational purposes.

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#### 5. Lawful Bases for Processing

We process personal data under one or more of the following lawful bases:

- Consent: for photography, promotional use, or optional communications.
- Contractual necessity: where processing is required to provide membership, training sessions, or club activities.
- Legal obligation: to comply with safeguarding, insurance, financial, or regulatory duties.
- Vital interests: where processing is necessary to protect someone's health or safety in an emergency.
- Legitimate interests: to support the safe, efficient operation of the club and communication with members and parents/carers.



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#### **6. How We Store and Protect Data**

BGS maintains secure systems for both digital and paper records.

Digital records are stored within secure cloud-based systems used for club administration and documentation. Imagery captured during club activities may be recorded using authorised club devices such as club phones or computers and is stored securely within authorised systems in accordance with the BGS Photography & Filming Policy.

Access to personal data is restricted to authorised personnel only, which may include the Club Director, Club Manager, Welfare Officer, coaches, volunteers, or administrative personnel where access is required to perform their role safely and appropriately.

BGS uses authorised club management systems for administration, registrations, and communication with members and parents/carers. Where third-party systems are used, BGS ensures appropriate data protection measures are in place.

Data is retained only for the minimum period necessary for safeguarding, operational, insurance, or legal reasons, after which it is securely deleted, anonymised, or archived in accordance with BGS data management and deletion procedures.

#### **Redactions and Data Minimisation**

When information must be shared — for example, in response to a safeguarding process, complaint, or lawful request — BGS may redact or remove personal identifiers to protect privacy and comply with UK data-protection law. Only information strictly necessary for the stated purpose will be shared.

#### **Operational Integrity and Access Control**

BGS reserves the right to restrict or revoke access to personal data or imagery where misuse, unauthorised sharing, or security concerns arise. All access to data must support lawful, safe, and legitimate club activity only.

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#### **7. Sharing Information**

We may share limited personal data where necessary and safe to do so with:

- Our governing or accrediting organisation where required for membership, insurance, safeguarding, or regulatory compliance.
- Event organisers, competition providers, insurers, club partners, or competition management systems where participation in competitions, events, training programmes, or external activities requires the



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submission of participant details. This may include information such as names, dates of birth, membership identifiers, or other relevant registration details necessary for event entry, insurance validation, safeguarding checks, or competition administration.

- Emergency services, medical professionals, or safeguarding authorities where required to protect the safety or welfare of an individual.
- Local authorities or multi-agency safeguarding partners where concerns are raised or safeguarding procedures require information sharing.

Personal data relating to one individual will not be shared with other members, parents, or third parties unless required by law, safeguarding duty, or a legitimate regulatory process.

Where personal data is shared with external organisations for legitimate sporting, safeguarding, insurance, or administrative purposes, those organisations are responsible for processing that information in accordance with their own legal obligations and privacy policies.

Where images, videos, or information relating to club activities are published on official Brackley Gymnastics School platforms (such as the club website or authorised social media channels), BGS takes reasonable steps to ensure that publication is appropriate and consent has been obtained where required. However, once material is placed in the public domain, BGS cannot control or prevent third parties, whether organisations or individuals, from copying, sharing, or redistributing that content.

BGS does not sell personal data to third parties. Personal information will only be used or shared for legitimate club purposes, including communication with members, safeguarding responsibilities, event administration, or the promotion of club activities where appropriate consent has been obtained in accordance with the BGS Photography & Filming Policy.

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## 8. Your Rights

Under UK data-protection law, individuals have the right to:

- Request access to the personal data we hold about them.
- Ask for corrections or updates to inaccurate or incomplete data.
- Request deletion of personal data where it is lawful to do so. However, deletion may not take place where information must be retained for safeguarding, welfare, medical, insurance, or legal purposes.
- Withdraw consent for non-essential data processing (such as imagery) in line with the Brackley Gymnastics School – Photography & Filming Policy.
- Raise a concern directly with BGS if they believe their personal data has been mishandled. Concerns will be reviewed promptly and handled in confidence.
- If a satisfactory resolution cannot be reached, individuals may raise the matter with the Information Commissioner's Office (ICO).



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Requests or concerns should be emailed to [brackleygymnastics@gmail.com](mailto:brackleygymnastics@gmail.com) or [bgs.welfare@gmail.com](mailto:bgs.welfare@gmail.com) and will be handled promptly and in confidence.

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#### **9. Retention and Deletion**

Personal data will be retained only for as long as necessary to fulfil safeguarding, legal, insurance, or operational responsibilities.

Where records are no longer required for these purposes, they will be securely deleted, anonymised, or archived in accordance with BGS data management and deletion procedures.

Certain records may need to be retained for longer periods where required by safeguarding guidance, insurance requirements, regulatory obligations, or applicable legal limitation periods.

Imagery, records, and communications may be periodically reviewed and removed where they are no longer required for operational, safeguarding, or promotional purposes.

Records linked to safeguarding concerns, complaints, incidents, or regulatory matters may be retained for longer where this is necessary to protect members, staff, or the club's legal and operational integrity.

Where personal data is no longer required and no lawful basis for retention exists, it will be securely deleted or anonymised in accordance with the BGS Image & Video Deletion Process (UK GDPR Compliant) and other relevant club data management procedures.

Certain records, including safeguarding reports, welfare concerns, and serious incident documentation, must be retained securely beyond the normal retention period where this is necessary to protect members, staff, or the club's legal and operational integrity.

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#### **10. Review and Availability**

This Privacy Notice will be reviewed at least annually — or sooner if required by changes in law, insurance requirements, or governing-body standards.

The latest version of this notice will always be available on the Brackley Gymnastics School website or provided on request from the club.