THE JITSU FOUNDATION LTD

PRIVACY NOTICE FOR OUR MEMBERS

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 participant of Jiu Jitsu who has registered his/her interest in participating in the martial art with us and/or whose details we have collected from one of our affiliated clubs, schools, universities or other third-party referral;
2. an instructor, technical official or referee who has registered for membership to find out more about the training courses and accreditation services we offer; or
3. a fan, participant or supporter of Jiu Jitsu who has contacted us to purchase any of our online merchandise and/or signed up to receive updates about upcoming events, offers and ways to get involved further with Jiu Jitsu.

References to **we**, **our** or **us** in this privacy notice are to The Jitsu Foundation Ltd trading as The Jiu Jitsu Foundation, PO Box 5068, Bath, BA1 0QD. The Jitsu Foundation Limited is a Company Limited by guarantee. Registered Office: Minerva Mill, Station Road, Alcester, Warks, B49 5ET. Registered in England No. 07384419.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Operations Manager has overall responsibility for data protection compliance in our organisation.

Contact details are set out in the "**Contacting us**" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

When you sign up to learn Jiu Jitsu or Self Defence 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;
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;
- use of and movements through our online portal, passwords, personal identification numbers, IP addresses, user names and other IT system identifying information;
- records of your attendance at any events or competitions hosted by us;
- images in video and/or photographic form and voice recordings; and
- your marketing preferences so that we know whether and how we should contact you.

Participants

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

- identification documents such as passport and identity cards;
- details of club and regional membership;
- details of next of kin, family members, coaches and emergency contacts;
- records and assessment of any gradings, competition results, details regarding events attended and performance (including that generated through member pathway programme);
- identification documents such as passport, utility bills, identity cards, etc.;
- any disciplinary and grievance information;
- any details required for the purposes of awarding scholarship funding or grants (including any means testing;

Instructors and officials

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

- any coaching code or official number;
- your current affiliated club or other organisation (if applicable);
- teaching qualification and/or training and teaching history and grading and competition performances;
- accreditation/qualification start and end date; and

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

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

- information about your race or ethnicity, religious beliefs and sexual orientation;
- information about your health, including any medical condition, health and sickness records, medical records and health professional information; and

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

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

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

3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about you when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

If you are a participant of Jiu Jitsu with us we also may collect personal information about you from any club, school or other organisation you are affiliated with or from other referrals such as from instructors.

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.

Sometimes, TJJF receives information about you from third parties. For example, if you are registered for the BUCS competition, we may be given information about you from BUCS.

TJJF may receive information relating to an incident or disciplinary matter from individuals or legal representatives.. Additionally, for certain role holders or those working with children, TJJF may receive information from the Disclosure and Barring Service, via GBG Group on the status of any DBS check you have been required to take.

4. **USES MADE OF THE INFORMATION**

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

Purpose	**Personal information used**	**Lawful basis**
All Members		
To administer any membership account(s) you have with us and managing our relationship with you, including arranging for any insurance and dealing with payments and any support, service or product enquiries made by you	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.
To arrange and manage any contracts for the provision of any merchandise, products and/or services.	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 merchandise/products/services.
To send you information which is included within your membership benefits package, including details about advanced ticket information, your insurance, competitions and events, partner offers and discounts and any updates on Jiu Jitsu.	All contact and membership details	This is necessary to enable us to properly manage and administer your membership contract with us.
To send you other marketing information we think you might find useful or which you have requested from us, including our newsletters, information about Membership, events, participation products and information about our commercial partners	All contact and membership details and marketing preferences	Where you have given us your explicit consent to do so.
To answer your queries or complaints	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.
Retention of records	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.

To conduct data analytics studies to better understand event attendance and trends within the sport	Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements	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 in sport.
Participants		
To conduct performance reviews, manage performance and determine performance requirements and administer your development and training requirements on any member pathway programme	All performance and attendance data and information about your health and medical condition. Details of any affiliated club and/or county membership.	This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above
To make decisions about your progression and development through any member pathway programme and to assist with the delivery of gradings.	All performance and attendance data and information about your health. Details of any affiliated club and/or county membership.	This is necessary to enable us to properly manage and administer your development through the performance programme. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To administer and monitor your attendance at events and competitions	All non-medical performance and attendance data. Details of any affiliated club and/or county membership.	This is necessary to enable us to register you on to and properly manage and administer your development through the performance programme.
To arrange for any trip or transportation to and from an event	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To administer any drug and alcohol testing	Health and medical information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To use information about your physical or mental health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate, to provide appropriate adjustments to our sports facilities and to monitor and manage sickness absence	Health and medical information	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To gather evidence for possible grievance or disciplinary hearings	All the personal information we collect including any disciplinary and grievance information.	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To assess your eligibility for and to provide any scholarship funding and/or grants	All details required for the purposes of awarding scholarship funding or grants (including any means testing)	This is necessary to enable us to properly administer and perform any contract for the provision of funding.
For the purposes of equal opportunities monitoring	Name, title, date of birth, gender, information about your race or ethnicity, health and medical information and	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.

	performance data	We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
For purposes of accounting and auditing	All event attendance data, transaction, payment data and membership data.	We have a legitimate interest to ensure we have accounting records and can manage our accounting systems.
Instructors and officials		
To administer your attendance at any courses or programmes you sign up to	All contact and membership details, transaction and payment data. Details of your current affiliated club or other, coaching/teaching qualifications and/or officiating history.	This is necessary to enable us to register you on to and properly manage and administer your development through the course and/or programme.
To conduct performance reviews, managing performance and determining performance requirements	All performance and attendance data and information about your health. Details of your current affiliated club or other, teaching qualifications and/or officiating history. Qualification start & end dates.	This is necessary to enable us to properly manage and administer your development through the course and/or programme. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To make decisions about your progression and accreditation status	As above.	As above.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
To administer any drug and alcohol testing	Health information	We have a legal obligation and a legitimate interest to provide you &other members of our organisation with a safe environment in which to participate in sport. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
To arrange for any trip or transportation to and from an event	Identification documents, details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to the event. We process special category personal data on the basis of the "special category reasons for processing of your personal data" referred to in section 2 above.
Social Media Users		
To respond to enquiries and publish via social media,	Social Media username	We have a legitimate interest to be able to respond to enquiries and publish news and details of events and share publicly available posts and tweets of relevance.
Website Users		
To enhance visitors experience of the website.	All website analytic data and cookies	Where you have given us your explicit consent to do so by clicking on the Cookie notice.

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

5. DIRECT MARKETING

Email, post and SMS marketing: from time to time, we may contact you by email, post or SMS with information about 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 then let us know at any time that you do not wish to receive marketing messages by emailing us at tjf@jitsufoundation.org. You can also unsubscribe from our marketing by clicking on the unsubscribe link in the marketing messages we send to you.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We share personal information with the following parties:

- **Any party approved by you.**
- **To any governing bodies, regional bodies for Jiu Jitsu and TJJF clubs:** to allow them to properly administer jiu jitsu on a local, regional and national level.
- **Other service providers**: for example, insurers, email marketing specialists, payment processors, promotional advisors, contractors or suppliers and IT services (including website, video- and teleconference services and backup);
- Our supply chain partners & sub-contractors, such as couriers, import/export agents, shippers.
- **The Government or our regulators**: where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services**: to assist with the investigation and prevention of crime and the protection of national security.

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

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

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

8. 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 usual 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:

- 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 been a member or worked for us.
- Information that may be relevant to safeguarding, disciplinary and qualification may be held for lifetime of the data subject.
- Records of a particular event, on event sheets, on results pages or in event reports, photographs and video may be held indefinitely in order to maintain a record of the Jiu Jitsu within TJJF.
- Records of communications not relating to the areas detailed above are retained for 3 years unless the communication platform prevents this.

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.

You may be able to update some of the personal information we hold about you through our membership portal. Alternatively, you can contact us using by using the details set out in the "**Contacting us**" section below.

9. 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.

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.

10. CHANGES TO THIS NOTICE

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

11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email tjf@jitsufoundation.org or write to us at The Jitsu Foundation Ltd, PO Box 5068, Bath, BA1 0QD:

Version dated 11th September 2023