**Jenkins’ Triathlon Coaching**

**Covid 19 Privacy Policy**

This privacy policy sets out how Jenkins’ Triathlon Coaching (hereon: ‘we’; ‘us’) uses and protects your personal data.

Jenkins’ Triathlon Coaching is committed to ensuring that your privacy is protected. Should you provide us with any personal data you can be assured that it will only be used in accordance with this privacy statement.

Jenkins’ Triathlon Coaching may change this policy from time to time by updating this document. You should check this document from time to time to ensure that you are happy with any changes.

**Who we are**

Jenkins’ Triathlon Coaching is a business that is owned and run by:

Peter Jenkins

Clydfan, Tal-y-bont, Cereidigon, Wales, UK, SY24 5ER

Email: [jenkspv@gmail.com](mailto:jenkspv@gmail.com)

Contact Pete if you have any questions about how your data is handled.

**What personal data we collect from you for Covid 19 purposes**

We collect the following personal data from you for Covid 19 purposes:

* Identity data: Your name
* Contact data: Your phone number
* Health data: Recent health and medical data to ensure it is safe for you to join in with a session.

**How we collect your personal data**

We collect your personal data by way of:

* A health questionnaire prior to each session.

**How we use your personal data**

The data we collect enables us to assess your ability to take part in the session and to provide your contact details to the Test and Trace service if necessary.

We will only use your personal data if we have a legal basis to do so. The table below sets out the personal data that we collect from you, how we use it and the legal basis on which we rely when we use it.

|  |  |  |
| --- | --- | --- |
| **Purpose/Activity** | **Type of data** | **Legal basis for use** |
| Assessing your ability to take part in a training session | Health data | Performance of a contract with you |
| Providing information to the Test and Trace service | Identity data  Contact data | Your consent |

Some of the data that we collect is “special category data” as it relates to your health. Special category information is more sensitive and we are required to satisfy an additional condition in order to use this data. The following table identifies the special category data that we collect and the additional condition that enables us to use it.

|  |  |
| --- | --- |
| **Type of data** | **Additional condition** |
| Health data | Your consent to process this data to assess your ability to participate in a training session |

**How long will we hold your data**

All the data we hold for Covid 19 purposes will be held for 21 days and then will be destroyed.

**Who we share your personal data with**

We will only share your personal data with the Test and Trace service.

**Data Security**

Access to your personal data is restricted to Pete Jenkins only. Personal data is held on a password and virus protected personal computer and/or in a password protected email account. Backups of your data are held on external storage media which is stored securely.

A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. There will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable, for example when it has been encrypted by ransomware or accidentally lost of destroyed.

We have procedures in place to handle any suspected breach of your personal data. If such a breach were to occur you will be notified at the earliest opportunity and we will also inform any applicable regulator where we are legally required to do so.

**Your Rights**

You have the right under data protection laws to:

* Be informed about the collection and use of your personal data. This document serves to provide you with this information.
* Request access your personal data. You may request a copy of the personal data we hold on you. We will provide this in a commonly-used machine-readable format.
* Request correction of the personal data that we hold on you. You can request that we correct or complete the personal data we hold on you if it is incomplete or inaccurate.
* Request erasure of the personal data we hold on you. You can request that we erase that data we hold on you. Note that we may not be able to comply with this request for specific legal reasons in which case you will be notified of these reasons. Note also that the erasure of your personal data may also mean that we are no longer able to provide you with our services.
* Request restriction of the processing of your personal data. You may request that we suspend processing of your personal data when you no longer want us to use it, but you do not want us to erase it. Note that restricting the processing of your personal data may also mean that we are no longer able to provide you with our services.
* Withdraw consent at any time. Where we are relying on consent to process your personal data you can withdraw this consent at any time. Note that withdrawing consent to use your personal data may also mean that we are no longer able to provide you with our services.

If you wish to exercise any of the rights set out above please contact us using the details in the **Who we are** section of this document.

**Making a complaint**

Please let us know if you are unhappy with how we have used your personal data by contacting Pete using the details in the **Who we are** section of this document.

If you are not satisfied with our response, or believe that we are no processing your data in accordance with the law, you have the right to lodge a complaint with the Information Commissioner’s Office (ICO). You can find there details at [www.ico.org.uk](http://www.ico.org.uk). We would be grateful for the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.