**Privacy Notice**

1. **Introducing ourselves.**

The Gibraltar Sports and Leisure Authority (collectively referred to as “GSLA”, “we”, “us” or “our” in this privacy notice) is responsible for the provision of structured and registered sport and leisure activities in Gibraltar.

We are responsible for:

Sporting Facilities

Playgrounds and associated maintenance

Supporting local registered sports associations

Training and coaching

Pool Lifeguarding and training

Running sporting programmes for youth and/or children with disabilities

Hosting international events on behalf of His Majesty’s Government of Gibraltar or assisting local sports associations to do so.

When we process your personal data or your child’s personal data we adhere to the principles of transparency, accountability and security of the Gibraltar General Data Protection Regulation (the “Gibraltar GDPR”).

We are committed to complying with all applicable data protection laws when processing your personal data. These laws are in place to safeguard your personal data and include measures covering data security, your rights regarding your personal data, and the use and disclosure of your personal data.

This privacy notice aims to provide you with information about our privacy practices and how we process your personal data.

It is important that you read this privacy notice together with any other privacy notice we may provide on specific occasions, so that you are fully aware of how and why we are using your personal data. You should read this privacy notice if you are a service user, a parent or carer, a child care provider or an employee of GSLA.

1. **What information does the organisation collect?**

GSLA collects and processes a range of information about you. Some of this information is mandatory in order to use our services, for safeguarding and medical reasons.

This includes:

* the name, address and contact details, including email address and telephone number of service users including young persons
* school/education provision (if under 16 years old)
* date of birth
* registration of attendance at sessions
* information about medical or health conditions of young persons, including whether or not the young person has a disability and/or allergy for which the organisation needs to make reasonable adjustments

We also ask for certain other information about young persons in order to provide the best possible service to our users. None of this information is mandatory:

* medical condition
* specific requirements, additional needs
* likes
* dislikes
* behaviour
* emotion
* social
* sensory

GSLA uses an application form to collect this data, which is found www.gsla.gi

1. **How we use your personal data.**

Whenever we process your personal data we ensure that we:

* process it lawfully, fairly and in a transparent manner.
* collect it only for valid purposes that we have clearly explained to you and not use it in any way that is incompatible with those purposes.
* hold accurate records and where possible keep your personal data up to date.
* keep it only as long as necessary for the purposes we have told you about.
* keep it safe and secure, to limit the potential of a personal data breach.

We will only use your personal data for the purpose for which we collected it, specifically for delivery of our public services, and contacting you for anything related to this. We may also process your information when this is shared for legitimate purposes (you can read more about our sharing practices in section 5 of this privacy notice).

Our lawful basis for processing your personal data is Article 6(1)(e) of the Gibraltar GDPR, which allows for processing that is necessary for the performance of a task carried out in the public interest or in the exercise of official authority that is vested in us as data controller. We also rely on Article 6(1)(b) whenever we enter into a contractual relationship with you, and Article 6(1)(c) whenever we are complying with a legal obligation.

Additionally, whenever we process special category personal data we rely on the following lawful bases under Article 9 of the Gibraltar GDPR:

* Article 9(2)(b) – for employee data when necessary for the purposes of carrying out our obligations and exercising specific rights in the field of employment.
* Article 9(2)(c) – for incidents that require emergency medical attention or immediate protection of a child or employee when necessary to protect their vital interests, and specifically when the person is physically or legally incapable of providing consent.
* Article 9(2)(e) – whenever our processing relates to information that has been manifestly made public by the data subject.
* Article 9(2)(f) – when we share information with our legal advisers for the establishment, exercise or defence of legal claims.
* Article 9(2)(g) – for reasons of substantial public interest, such as; government purposes, equality of opportunity, preventing or detecting unlawful acts, preventing fraud, providing support for individuals with a particular disability or medical condition, offering counselling, and safeguarding children.

We will collect information about you for a number of purposes. These include:

The administration of registered sports associations

Directing the public to correct information providers

Accreditation records

Accreditation and requalification renewal information

Emergency Procedures

Safe and adequate delivering of sports and leisure programmes

Recruitment campaigns

1. **Keeping your information safe.**

The security and confidentiality of your personal data is very important to us. We will ensure that:

* safeguards are in place to keep your personal data secure.
* only authorised staff are able to view your data.
* we do not make your information available for commercial use.
* we only ask for what is necessary to meet our objective of providing our services to you.
* our processors only process your personal data on our instructions and they are subject to a duty of confidentiality.
* we will notify you, and any applicable regulator, of a personal data breach that may present a high risk to your rights and freedoms.

When considering the type of safeguards that we can implement we take into account; the state of available technology, the implementation costs, the type of personal data that we process, the potential risk implications in the event of a personal data breach, along with the likelihood of risk and the severity of risk to your privacy rights.

1. **Sharing your personal data.**

We sometimes need to make your personal data available to other organisations. These might include contracted partners (who we have employed to process your personal data on our behalf) and/or other organisations (with whom we need to share for specific purposes). Where it is lawful to do so, we may share your personal data with:

* your family members and/or representatives.
* Schools and educational organisations
* Government departments and authorities (such as the Care Agency and Gibraltar Health Authority).
* law enforcement and regulatory bodies.

In order to provide you with more detail, we share your personal data in the following circumstances:

* meeting our intended objectives of delivering a sports and leisure service to Gibraltar.
* complying with our legal obligations as an employer.
* safeguarding children.
* assisting law enforcement bodies in the prevention, investigation, detection or prosecution of criminal offences.
* preventing fraud or to assist in the recovery of public debt.
* informing policy decisions, and for research and statistical purposes.

1. **Our retention practices.**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

1. **Your rights.**

Under data protection law, you have certain rights in relation to your personal data and how we process it. You have the right to ask us to:

* confirm whether we hold any of your personal data and request a copy of the information. The process of asking for access to your personal data is known as a Data Subject Access Request (“DSAR”).
* correct any inaccuracies in your personal data and to modify it in such a way if you believe the personal data we hold is incomplete.
* delete (in as much as is possible in the specific circumstances) any of your personal data, where we are required to do so by law.
* stop processing your personal data, where we are required to do so by law.
* let you have a portable copy of the personal data we hold about you, where we are required to do so by law.
* stop processing any of your personal data that is processed by us on the basis of our legitimate interests.
* withdraw your consent whenever we process your personal data on the basis that you have given us your consent to do so.

It may not always be possible to agree to your request, if the need to keep the record is of significant importance. If this is the case, we will explain our reasoning.

If you wish to exercise any of these rights or have any queries about this privacy notice or our privacy practices, please email us on [info@gsla.gi](mailto:info@gsla.gi) or write to us at:

**Gibraltar Sports and Leisure Authority**

#### Bayside Sports Complex

# Bayside Road

**Gibraltar**

Alternatively, you may contact our Data Protection Officer on [dpo@gibraltar.gov.gi](mailto:dpo@gibraltar.gov.gi)

If you remain dissatisfied with our processing of your personal data, you can make a complaint to the data protection supervisory authority by contacting them on:

Gibraltar Regulatory Authority,

2nd floor, Eurotowers 4,

1 Europort Road,

Gibraltar.

(+350) 20074636

privacy@gra.gi