

## ABOUT US

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The Lambs is the trading name of The Independent Schools Rugby Football Club Ltd, a company registered by guarantee and registered in England.

This Privacy Notice explains how the Lambs collects, uses and shares your personal data. How we use data depends on whether you interact with us as a school, member of a club team, an area organiser, an official, a coach or a participant in a training camp or member of a Lambs' squad.

The Independent Schools Rugby Football Club  
The Residence Collingwood House  
The Royal Hospital School  
Holbrook  
Suffolk  
IP92RX

## SUMMARY OF HOW WE USE YOUR DATA

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- The Lambs uses your personal data to manage and administer your membership and your involvement with its events, training days and residential camps, and to keep in contact with you for these purposes.
- Schools' data is shared with RFU, who use your data to report to Sport England, voting rights for AGM and to help develop and manage Rugby.
- Data of selected athletes is also shared with Schools, Universities, Academies and Clubs, for example with age-grade checks and agreement.
- Where we or the RFU rely on your consent, such as any consent we seek for email marketing, you can withdraw this consent at any time.
- Amongst the data we collect from you may be medical (including injury) information. We will hold this where you (or your parent) have given consent, so that we can ensure we are aware of your condition and can that you are supported appropriately.
- Where you work in a particular role within the sport, you may be required to undergo a Disclosure & Barring Service check using the DBS system.

## WHAT DOES THIS POLICY COVER?

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This policy describes how The Lambs (also referred to as "we" or "us") will make use of the data we handle in relation to our members. It also describes your data protection rights, including a right to object to some of the processing which we carry out. More information about your rights, and how to exercise them, is set out in the "What rights do I have?" section.

## WHAT INFORMATION DO WE COLLECT?

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### Schools

We collect and process data from schools when they nominate players to join. This includes:

- The name and address and telephone number of the school, the name of the nominating teacher, the name and email address of the teacher contact for that school.
- We collect and process the name and email address of a parent or guardian.
- We collect the following personal data of individual nominees who participate in our matches and international tours: Name, school and date of birth. Names may be withheld from website publication at the request of the school representative, parent, guardian or player.

### Matches

We collect and process data from venues which include contact details of managers, sponsors and traders, providers of first aid.

### Training days and matches

We collect and process personal data of each participant from a parent/guardian:

- name
- school
- gender
- date of birth
- name of local club if applicable
- home address, email address and phone number
- players evaluation
- videos and photos – for the purpose of performance analysis
- videos and photographs for use by the athlete or for promotional purposes – the athlete has the right to opt out of publication at each event

### Additional information collected for training/playing abroad

- passport details
- insurance details
- medical conditions or disability to ensure we are aware of any support we may need to provide to you.
- dietary requirements

## Coaches

- We collect and process the following:
- Accreditations, qualifications and training;
- Availability, selection and travel information;
- Evaluations and assessments;
- DBS information (criminal records checks), where applicable; and/or
- Disciplinary and safeguarding information, where relevant.
- Full name, date of birth and passport number if travelling abroad.

## Board members, Area Representatives

- Name, address, email address and contact numbers.
- Disciplinary and safeguarding information, where relevant;

## HOW DO WE USE THIS INFORMATION, WHAT IS THE LEGAL BASIS FOR THIS USE?

We process this personal data for the following purposes:

- To fulfil a contract, or take steps linked to a contract: this is relevant where you make a payment for match fees any merchandise, or tour. This includes:
  - Taking payments
  - Communicating with schools and the parents of players participating
  - Providing and arranging the delivery or other provision of products, prizes or services
  - Publication of results on the Lambs and XVRugby websites
  - To conduct our business and pursue our legitimate interests, in particular we will use your information to manage and administer your membership and your involvement and to keep in contact with you for these purposes
  - We will also use data to maintain records of our performances and history
  - Some venues use CCTV cameras to maintain the security of their premises and may use this video to investigate incidents on its premises.
  - To organise competitions, and training events, process and publish results, analyse player performances for the purpose of identifying squads and teams for participation at matches.
- Where you give us consent:
  - We may handle medical, dietary or disability information to ensure we support our players appropriately
  - On other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time
- For purposes which are required by law:
  - We maintain records such as health and safety records and accounting records in order to meet specific legal requirements
  - We ensure, where you will work with children, that you have undergone an appropriate DBS check – this is also carried out with your consent

- Where you hold a role with The Lambs requiring us to check your right to work, we may process information to meet our statutory duties
- We may respond to requests by government or law enforcement authorities conducting an investigation.
- The RFU will use the information provided by schools according to its own Privacy Policy.

## **WITHDRAWING CONSENT OR OTHERWISE OBJECTING TO DIRECT MARKETING**

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Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

## **WHO WILL WE SHARE THIS DATA WITH, WHERE AND WHEN?**

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Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on our behalf for the purposes identified above. This could include travel companies, National and Tour Managers, Area Organisers and venues where events are held.

Data may be shared with third party service providers outside the UK, such as hotels and flight companies and others involved in the participation of players in training on tour abroad.

Where information is transferred outside the EEA, and where this is to a stakeholder or vendor in a country that is not subject to an adequacy decision by the EU Commission, data is adequately protected by EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or a vendor's Processor Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review on request.

## **WHAT RIGHTS DO YOU HAVE?**

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You have the right to ask us for a copy of your personal data; to correct, delete or restrict (stop any active) processing of your personal data; and to obtain the personal data you provide to us for a contract or with your consent in a structured, machine readable format.

In addition, you can object to the processing of your personal data in some circumstances, (in particular, where we don't have to process the data to meet a contractual or other legal requirement, or where we are using the data for direct marketing).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

You have the same rights for data held by the RFU for its own purposes on the member management system.

To exercise any of these rights, you can get in touch with us – or, as appropriate, The RFU or its data protection officer – using the details set out below. If you have unresolved concerns, you have the right to complain to the Information Commissioner's Office.

Much of the information listed above must be provided on a mandatory basis so that we can make the appropriate legal checks and register you as required by RFU Rules and Regulations. We will inform you which information is mandatory when it is collected. Some information is optional.

## **HOW DO YOU GET IN TOUCH WITH US?**

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We hope that we can satisfy queries you may have about the way we process your data. If you have any concerns about how we process your data, [or would like to opt out of direct marketing], you can get in touch at [a.laybourne@hotmail.com](mailto:a.laybourne@hotmail.com) or by writing to The Lambs.

## **HOW LONG WILL WE RETAIN YOUR DATA?**

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We process the majority of schools' data for as long as you are an active member and for two years after this.

Where we process schools' data for marketing purposes or with your consent, we process the data for 2 years unless you ask us to stop, when we will only process the data for a short period after this (to allow us to implement your requests). We also keep a record of the fact that you have asked us not to send you direct marketing or to process your data indefinitely so that we can respect your request in future.

Where we process personal data in connection with performing a contract, we keep the data for 5 years from your last interaction with us.

Where we process personal data in connection with participation in Teams we keep the data for six months after the end of the tour, unless we need to meet a contractual or legal requirement.

Where we process personal data in connection with participation in The Lambs training we keep the data for twelve months after the end of the day, unless we need to meet a contractual or legal requirement.

Where we process personal data in connection with performance on training days and tours we keep the data for as long as that player is in school attendance for purposes of squads and touring team information.

We will retain information held to maintain statutory records in line with appropriate statutory requirements or guidance.

Photos and videos used in promotional publications will be retained for that purpose for the lifespan of that publication. All other material recorded on cameras should be deleted by 12 months after the end of the event.

Records of your involvement in a particular competition, on results pages or in competition reports may be held indefinitely both by us and RFU in order to maintain a record for sport.