

# MANCHESTER FRONTRUNNERS PRIVACY POLICY



MANCHESTER  
FRONTRUNNERS

Manchester Frontrunners (“MFR”, “we”, “us” or “our”) is an LGBT running club managed and facilitated by the voluntary members of the MFR committee (each a “Committee Member”). MFR is open to anyone, regardless of age, gender, sexuality or running ability, and MFR is part of the International Frontrunners network of LGBT running clubs all over the world. For more information about MFR, please visit our website: <http://manchesterfrontrunners.org.uk/> (“Website”). When you become a member of MFR, we provide certain services to you including registering and managing your MFR and UK Athletics memberships, informing you about MFR club and non-club events, training sessions and races, maintaining and promoting the MFR community and supplying you with running kit (“Services”), which are described further below.

We are committed to protecting and respecting the privacy of our members, Committee Members and visitors to our Website (“you” or “your”). This privacy policy (“Privacy Policy”) sets out the basis on which the personal data collected from you, or that you provide to us, will be processed by us. Please read the following carefully to understand how we will use your personal data. For the purpose of data protection legislation in the UK, we are the controller of personal data.

## 1. WHAT PERSONAL DATA DO WE COLLECT AND PROCESS, AND HOW DO WE USE IT?

When you engage with MFR, whether by signing up for a membership or interacting with the MFR community (including via our Website), you may provide us with your personal data, and we may collect and process such personal data in accordance with in this Privacy Policy and as follows:

- **Registering and managing your MFR and UK Athletics memberships:** if you wish to sign up to become a member of MFR, you will be required to fill in our membership form which requires you to provide: your title, first name, surname, gender, date of birth, nationality, home address and postcode, telephone number, email address and UK Athletics license number (if applicable) (“**Membership Form Data**”). As part of signing up with MFR, we also share your Membership Form Data with UK Athletics (as described in Section 2 below) and your Membership Form Data will be used by MFR and UK Athletics respectively to register and manage your respective memberships in order that you can take part in running events, training sessions and weekends, and races. Your nationality is required by UK Athletics to determine your eligibility to take part in some running events. If you have a disability, we can offer assistance to you during your participation in MFR as a member of MFR, if you decide that you require it. We do not keep formal records of your disability, but in order to provide you with assistance, we may share details of your disability (that you have disclosed to us) between the MFR Committee Members in order to provide assistance to you (“**Disability Data**”). We require payment from you to process your membership and if you choose to pay your membership fees by BACS transfer into our MFR bank account, your bank account details, including sort code and account number (“**Financial Data**”) will be visible to us from the MFR bank account and we do not store your Financial Data elsewhere. We process your Financial Data only to receive payment of your membership fees or if you request a refund from us. We process your Membership Form Data and Financial Data for the performance of the contract we have with you for the purposes of registering and managing your MFR membership in return for your membership fees. We rely on your explicit consent to process your Disability Data, where requested to do so by you, to provide you with assistance and support your participation in MFR. Please contact us if you require assistance by emailing us at [secretary@manchesterfrontrunners.org](mailto:secretary@manchesterfrontrunners.org).
- **Informing you about MFR club and non-club events, training sessions and races (“Events”) and related MFR club news:** we use your email address to keep you informed of Events through a monthly newsletter. If you are a member of MFR, we have a legitimate interest to use your email address to send you messages, invites and email notifications about Events and related MFR club news as part of your membership and to provide you with information about the benefits of your membership, and to facilitate your participation in MFR. We may also offer to purchase MFR running kit for you as a member of MFR, and where we do so, we have a legitimate interest to process your email address to give you the option of purchasing MFR running kit from us. If you are not a member of MFR, we may use your email address to send you messages, invites and email notifications about Events and related MFR club news, and where we do, we rely on your consent.

- **Maintaining and promoting our MFR community:** we take photographs of our members during Events to help promote our MFR community, and such photographs may be featured in our monthly newsletter or on our Website. We also publicise MFR members' race records on our Website, which includes your name and gender. We have a legitimate interest to use your image in these photographs and publicise MFR members' race records for the purposes of maintaining and promoting our MFR community, which is achieved, in part, by interest from potential new members of MFR. You may ask us to take down or remove any photograph, or ask us to anonymise any of your race records, that appear on our Website, and we will comply with your request.
- **Facilitating engagement within the MFR community:** our Website includes posts, news, stories and other related information about MFR and the MFR community ("**Updates**") and by visiting the Website you may comment on these Updates to ask questions or share additional information in respect of such Updates. If you choose to comment on one of the Updates, you will need to provide your name and email address. If your comment is approved, your name will appear alongside your comment on the Website, but your email address will not be displayed. We have a legitimate interest to process your name and email address when you comment on an Update to monitor comments for the protection of visitors to our Website, and to contact you in respect of your comment should you require us to, or should we need to.
- **Supplying MFR running kit to you:** if you wish to purchase MFR running kit from us, you will be required to provide us with your vest size and any other size as applicable ("**Running Kit Data**"). We are required to process your Running Kit Data for the performance of the contract we have with you to supply with you running kit in accordance with your request.
- **Operation of MFR:** for those members and Committee Members that offer to provide coaching to MFR members, we obtain your first name, surname, whether you have a current DBS (Disclosure and Barring Service) certificate and the expiry date of such certificate, coaching qualifications and coaching licence ("**Coaching Qualification Data**") from England Athletics. We use your Coaching Qualification Data to assess your suitability to provide coaching to our members and to allocate leaders and running buddies during our Events. We have a legitimate interest to process your Coaching Qualification Data to ensure our members receive coaching from individuals who are qualified to provide coaching and to ensure the safety and wellbeing of our members. We use and store your personal data in membership lists, which includes your Membership Form Data, Running Kit Data and Coaching Qualification Data, and your Facebook ID for managing the MFR Facebook group (only if you have signed up to MFR Facebook group). These membership lists are to enable us to provide our Services to you. Except where such is shared with third party service providers (as described in Section 2 below), access to membership lists is limited to our Committee Members. We use your name and UK Athletics licence number to assist us with recording attendance at Events and to help us run these Events ("**Attendance Data**"), which is included in our membership lists. We also use Attendance Data for our annual MFR awards. We have a legitimate interest to process your personal data in our membership lists in order to provide our Services to you and for our annual MFR awards.
- **Improving MFR:** we may aggregate and anonymise your personal data with the personal data of other members of MFR and visitors to our Website to create datasets and statistical reports of information about the use of our Website or engagement with the MFR community. Aggregated data may be derived from your personal data but is not considered to be personal data under data protection legislation in the UK as it does not directly or indirectly reveal your identity. We may do this for the purposes of helping us to improve MFR and the Services we provide to you by analysing use and engagement. We do not share these datasets and statistical reports with third parties, but may share the reports with members of MFR. We may also conduct surveys from time to time, which shall be anonymous, and our reasons for doing so are for the same purposes as why we may prepare statistical reports: to analyse use and engagement. If we do combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, the combined data is personal data and we deal with it in accordance with this Privacy Policy.
- **Committee Members of MFR:** if you are a Committee Member we will process your name to set you up with a Committee Member account on the Website to assist with managing and facilitating MFR, including operating and posting Updates on the Website and uploading photographs to support with the maintenance and promotion of our MFR community. We also include your headshot on our Website to assist potential new members of MFR and existing members of MFR should such members have questions or need assistance as a result of their participation in MFR. We have a legitimate

interest to process your personal data in this way for the operation of MFR and the benefit of members of MFR to know who manages and facilitates MFR.

- **Compliance with legal or regulatory requests:** we may be required to process your personal data to comply with a legal or regulatory request, and if we do, we may share this data with a regulator or law enforcement agency (as described in Section 2 below).

## 2. WHO DO WE SHARE YOUR PERSONAL DATA WITH?

By signing up as a member of MFR, or interacting with MFR, we may need to disclose your personal data to selected third parties in the following limited circumstances:

- **UK Athletics and its affiliates (for example England Athletics):** in order to provide our members with the benefits offered by UK Athletics, such as access to UK Athletics races (including eligibility to races and related events), discounts to races, and for insurance purposes our members must be registered with UK Athletics and have a UK Athletics licence number. We share your Membership Form Data with UK Athletics in order for UK Athletics to register and manage your UK Athletics account and to provide you with a UK Athletics licence number.
- **Third party service providers for the operation of MFR:** to operate MFR we rely on a number of carefully selected third parties to provide us with products and services. These include our bank to process membership fees, a website hosting provider to provide our Website and cloud services provider to manage and store records of your personal data (for example our membership lists). We permit these third party service providers to process your personal data only to the extent necessary to enable us to provide the Services to you. We do not allow these third party service providers to process your personal data for any other purposes.
- **Third party service providers for marketing purposes:** in order to keep you up to date about the MFR community, including informing you about Events and MFR club news, we use an email marketing tool provided by a third party and we share your name and email address with such third party for marketing purposes.
- **Visitors to our Website:** if you choose to engage with the MFR community by posting a comment on an Update, your name and comment will be visible by anyone that may visit our Website.
- **To comply with legal or regulatory requests:** if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation, we may share your personal data with a regulator or law enforcement agency.

## 3. TRANSFERS OF YOUR PERSONAL DATA

We will not transfer your personal data outside of the EU, except to selected third parties that we have instructed to help us provide the Services to you, including in particular that we use cloud based services from Google Inc. to store your personal data, which may be in any one of its geographically distributed data centres as part of its cloud platform.

In the case of these transfers, where the transfers are not to countries that provide an adequate level of protection (for example, relying on the EU-US Privacy Shield Framework where the transfer is to a US entity), we will use reasonable efforts to put in place appropriate safeguards to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses adopted by the European Commission. Please [click here](#) for a link to the standard contractual/data protection clauses and [click here](#) for more information about the EU-US Privacy Shield Framework for US companies.

If there are any other circumstances which would require us to transfer your personal data outside of the EU, we will seek your consent to transfer your personal data outside of the EU. In the event of such a transfer, where applicable, we will put appropriate safeguards in place to cover transfers of your personal data including, for example, signing standard contractual clauses/data protection clauses adopted by the European Commission, or where applicable, relying on an adequacy decision of the European Commission (for example the EU-US Privacy Shield Framework where the transfer is to a US entity).

If you would like further information, please contact us at [secretary@manchesterfrontrunners.org](mailto:secretary@manchesterfrontrunners.org).

#### 4. COOKIES

We use the following categories of cookies within our Website:

- **Strictly Necessary Cookies:** these cookies are essential to enable you to move around our Website and use its features or to enable us to provide the Website features to you. Without these cookies, services you have asked for such as remembering your login details, if you are a Committee Member, and your name and email address for when you add a comment on our Website.
- **Performance Cookies:** these cookies collect anonymous information on how you use our Website. For example, we use Google Analytics cookies to help us understand how visitors to our Website navigate the Website and to highlight areas where we can make improvements. The data stored by these cookies does not show personal details from which your individual identity can be established. You may opt out of these cookies using your browser settings but it may affect the performance of our Website.
- **Functionality Cookies:** these cookies help to provide certain aspects of our Website's functionality, including the operation of our anti-spam system, which checks whether JavaScript is available, and whether cookies are enabled, within your Internet browser. These cookies also track and store the date and time of your visit. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. You may opt out of these cookies using your browser settings but it may affect the functionality of our Website.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your Internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at [www.aboutcookies.org](http://www.aboutcookies.org). By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Website.

To opt out of Google Analytics cookies across all websites, please visit: [Google Analytics Opt-out Browser Add-on](#) and for other third party cookies relating to behavioural advertising, please go to [www.youronlinechoices.eu](http://www.youronlinechoices.eu). Opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver adverts tailored to your web preferences and usage patterns, so you may see a greater number of adverts that are irrelevant to you and your preferences.

#### 5. THIRD PARTY WEBSITES

Our Website may contain links to third party websites, plug-ins and applications, including links to our social media profiles and communities on third party websites. If you follow a link to a third party website, please note that this Privacy Policy does not apply to those websites. We are not responsible or liable for the privacy policies or practices of those websites, so please check their policies before you submit any personal data to those websites.

#### 6. DATA RETENTION

We store your personal data in line with legal, regulatory, financial and good-practice requirements, and our general approach to data retention is that we conduct an annual review of the personal data we store in respect of our members that usually takes place shortly after our annual general meeting ("**Data Audit**"). Except as otherwise set out below, we delete your personal data if you have ceased to be a member of MFR for more than four years at the time we conduct our Data Audit, in line with England Athletics Limited's retention policy. We have experienced previous MFR members returning to MFR, for example as a result of a break due to injury, and it is for such reasons that we retain your personal data after you have ended your membership with MFR. This does not affect your rights, which are set out below.

We store some of your personal data outside of the approach described above depending on the type of data and this personal data is retained on the following basis:

- We shred any paper copies of your membership form once we have processed your membership form containing your Membership Form Data (but we do continue to use your Membership Form Data as described in Section 1 above).
- Functional Cookies that are used for the operation of our anti-spam system expire when your Internet browsing session ends, except in the case of the cookies that track and store the date and time of your visit, which expire one day after you visit our Website. We no longer process these cookies after they expire.
- We do not delete race records, photographs or comments on Updates on our Website (“**Promotional Material**”), except where requested to do so by a member of MFR, on the basis that Promotional Material is valuable for promoting MFR as a well-established and long standing LGBT running club.

## 7. ACCESSING YOUR PERSONAL DATA AND YOUR RIGHTS

As a result of us collecting and processing your personal data, you have the following legal rights:

- to access personal data held about you;
- to request us to make any changes to your personal data if it is inaccurate or incomplete;
- to request your personal data is erased where we do not have a compelling reason to continue to process such data in certain circumstances;
- to receive your personal data provided to us as a data controller in a structured, commonly used and machine-readable format where our processing of the data is based on: (i) your consent; (ii) our necessity for performance of a contract to which you are a party to; or (iii) steps taken at your request prior to entering into a contract with us and the processing is carried out by automated means;
- to object to, or restrict, our processing of your personal data in certain circumstances;
- if we use your personal data for direct marketing, you can ask us to stop and we will comply with your request;
- if we use your personal data on the basis of having a legitimate interest, you can object to our use of it for those purposes, giving an explanation of your particular situation, and we will consider your objection;
- to object to, and not be subject to a decision which is based solely on, automated processing (including profiling), which produces legal effects or could significantly affect you; and
- to lodge a complaint with a data protection supervisory body, which at present, is the Information Commissioner’s Office.

To exercise any of your rights set out above, including to withdraw your consent where we have stated we are processing your personal data based on your consent, please contact us at [secretary@manchesterfronrunners.org](mailto:secretary@manchesterfronrunners.org).

## 8. CONTACTING US AND CHANGES TO YOUR PERSONAL DATA

If you have any questions, comments and requests about this Privacy Policy or your personal data, please email us at: [secretary@manchesterfronrunners.org](mailto:secretary@manchesterfronrunners.org) or write to us at: Manchester Fronrunners, 79 Ribston Street, Manchester M15 5RJ.

It is important that the personal data we hold about you is accurate and up-to-date. Please notify us by email or post with any changes to your personal data.

## 9. CHANGES TO OUR PRIVACY POLICY

Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back regularly to keep informed of updates or changes to this Privacy Policy.

This Privacy Policy was last updated in May 2018. Earlier versions of this Privacy Policy may be obtained by contacting us.