Upton Tri+ LLP Privacy Policy

Introduction

This privacy policy (the "Policy") sets out how Upton Tri+ LLP ("we", "our", "us") will use any personal data we collect from you, or you provide to us. It is applicable to our website <u>www.uptontriathlon.com</u> (the "Website") and your direct interactions with us.

By visiting the Website you accept and consent to the practices described in this Policy.

By entering the event you accept and consent that your name will appear in the online entry lists on EntryCentral's website, our Website and in the official set of results published on StuWeb's website, together with your gender, your age category and any club or group affiliation that you declared when you entered.

Any changes we may make to our Policy in the future will be posted on this page and, if significant, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.

This Policy was last updated on 24 May 2018.

Who we are

Upton Tri+ LLP of Ryalls Court, Upton-upon-Severn, Worcester WR8 OPF is a Limited Liability Partnership. We are the data controller for the purposes of the General Data Protection Regulation (Regulation (EU) 2016/279) and any other law applicable to the processing of your personal information. We will take all necessary steps to ensure that your personal information is processed by us in accordance with these data protection laws.

Questions, comments and requests regarding this Policy are welcomed and should be addressed to Upton Tri+ LLP, Ryalls Court, Upton-upon-Severn, Worcester WR8 0PF or made electronically to info@uptontriathlon.com.

Data we collect	How we collect it	Why we collect it
Identity data (first name, last name, gender, date of birth, BTF number, Contact data (email address, telephone number, postal address)	Via our third party online entry service Via contact form on our website Via emails you send to us	To enable you to participate in the event To inform you of race related information To enable the timing company to record and publish correct results To inform you of future Upton Tri+ events (only if explicit
Emergency contact data (name,	Via our third party online entry	consent given) In case of emergency during the
telephone number)	service	event
Interesting facts	Via our third party online entry service	For the commentator to use during the race
Dietary requirements	Via our third party online entry service	To ensure appropriate food is provided
Marshal volunteer data	Via contact form on our website Via emails you send to us	To communicate to and appropriately allocate marshals To invite you to volunteer again
Technical data (IP address, registered domain, browser type, hardware type, network and software identifiers, system configuration information, device information)	Using automated technologies or interactions (such as cookies and other similar technologies)	To distinguish you from other users to help us provide you with a good experience when you browse our website To help us to improve our site.
Usage data (visits to and use of	Using automated technologies	To perform statistical and trend

What information we collect, how and why

, , ,,	or interactions (such as cookies and other similar technologies)	analysis

In addition, we may collect, use and share aggregated data such as statistical or demographic data.

Who else processes your data

We use third parties for online event entry, race timing and results publication, for our website and for sending mass emails. These data processors are not employees, agents or otherwise connected with us and each has their own privacy policies available on their websites that should also be read.

- We use <u>EntryCentral</u> to collect the data necessary to sign up for our event. EntryCentral has its <u>own privacy policy</u> and you should refer to it for any questions you may have about the information they collect about you.
- We use <u>StuWeb Productions</u> to time our races and publish the results online. We share your Identity Data and Interesting Facts with them to facilitate this. The online results show your first name, surname, gender, age group, club, race position and times.
- We provide <u>MailChimp</u> with your first name, surname and email address to enable them to send mass emails for us about a) the event you entered and b) about future Upton Tri+ events if you opted in to this when you signed up.
- We are hosted on the <u>Wix.com</u> platform. Wix.com provides us with the online platform that allows us to inform you about our event and sell it to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.
- We may disclose your personal information to not-yet-known third parties:
 - If Upton Tri+ LLP or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
 - If we are under a duty to disclose or share your personal data in order to comply with any legal or moral obligation.

We may transfer some of your personal information to third parties who are located in countries outside of the European Economic Area ("EEA"). We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

By submitting your personal data, you agree to this transfer, storing or processing.

Cookies

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our site. Here are the cookies we use and the purposes for which we use them:

Cookie name	Life span	Purpose
svSession	Permanent	Creates activities and BI
Hs	Session	Security
incap_ses_\${Proxy-ID}_\${Site-ID}	Session	Security
incap_visid_\${Proxy-ID}_\${Site-ID}	Session	Security
nlbi_{ID}	Persistent cookie	Security
XSRF-TOKEN	Persistent cookie	Security

Communication preferences

You can ask us to stop sending you emails at any time by clicking 'unsubscribe' on any email or by <u>contacting us</u> with a request to be unsubscribed.

Your rights

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

You have the right to:

- i. ask us to provide a copy of the personal information we hold about you
- ii. ask us to have personal information about you removed
- iii. ask us to have any inaccurate personal information about you corrected
- iv. object to processing of your personal information where we are relying on a legitimate interest
- v. request the restriction of processing of your personal information
- vi. request the transfer of your personal information to a third party
- vii. where you have provided your consent to certain of our processing activities, in certain circumstances, you may withdraw your consent at any time (but please note that we may continue to process such personal information if we have legitimate legal grounds for doing so).

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Linking to or from other websites

Our Website contains links to other websites, operated by our affiliates, partners or third parties. Please be advised that the practices described in this Policy for us do not apply to information gathered through these third party website(s). These other website(s) may also send their own cookies to you, collect your data or solicit your personal information. Always be aware of the terms of use and privacy policies of the websites you link to. We are not responsible for the actions and/or privacy policies of third parties or their websites. We encourage you to be aware of when you leave our Website and to read the privacy policies and terms of use of each and every website that you visit.

How long do we keep your data?

If you gave your consent to be kept informed about future Upton Tri+ events we will keep your first name, surname and email address indefinitely unless you ask us to remove it from our database by unsubscribing. We will delete the remaining data 9 months after the event date.

If you did not give your consent we will keep your data for 9 months after the event date.

Thank you for taking the time to read our Policy.