

# CYCLING TIME TRIALS GDPR GUIDANCE ORGANISERS DATE: APRIL 2018

### **GDPR GUIDANCE - EVENT ORGANISERS**

Nearly everyone will have heard of the General Data Protection Regulation, commonly known as the GDPR. This comes into effect on 25 May 2018. The GDPR does have an impact on CTT and care must be taken about how an individual's personal information is used.

Please don't be put off by this guidance. On first looking at this it may appear daunting. It isn't intended to be! Its purpose is to summarise how the GDPR will affect you as an organiser of a time trial and what needs to be done to safeguard an entrant's personal information that's given on the entry form.

It is acknowledged that there are many "you must not..." references in this guidance. This is for your own protection as the "data processor" and for the protection of CTT as the "data controller".

# An organiser's contact details

If you are the organiser of an event to be promoted under CTT's rules and regulations, your contact details (name, postal address, telephone number and email address), will be published in the annual CTT handbook and on the CTT website. Such details may also be published on the relevant CTT District website or in the relevant CTT District handbook.

#### Entrant's personal information to be used only for the purposes of the event

Organisers of CTT events need to be aware that the information provided on an entry form to a CTT event (whether via the CTT online entry system or the standard CTT paper entry form) must be used only for the purposes of the promotion and management of the event. You cannot use that information for anything else. This is because that information is the entrant's personal information and is personal data for the purposes of the GDPR.

Certain information may be published on the start sheet and result sheet for the event. It is expected that this will be limited to the entrant's name, gender, age or age category, CTT number and the affiliated club of which the entrant is a member. The entrant's personal best time or distance or best performance in the last three years may also be published on the start sheet. In the case of the result sheet, the recorded time or distance in the event will also be published.

Under no circumstances must the entrant's contact details (postal address, email address or telephone number be released to a third party or to other competitors in the event. As is to be

expected, those details can be released to an appropriate CTT District official or to one of the National officers of CTT (e.g. the CTT National Secretaries or the National Treasurer).

If you send the start or result sheet to the competitors in the event by email, you must use the BCC function, so that the email addresses of the competitors are not made public. Also, please take care to send out only the start sheet or the result sheet and not the spreadsheet containing all of the entrants' contact and emergency contact details.

You must not use the entrant's personal information to send emails to an entrant for marketing purposes unless you have the explicit consent of the entrant to do so. It is unlikely that when promoting a CTT event you will have any such consent.

## Personal information must be kept secure

You must keep the information provided to you by the entrant secure at all times. Please remember to password protect files and computers. In the case of paper copies of information, these should always be kept as securely as possible and not be left anywhere for others to see or left in a public place.

When using third party software you need to obtain assurances over the security of the system, e.g. by asking the provider for an explanation of how data security is managed. If you back-up your computer to the "cloud", you should also ensure that the company you use is within the European Economic Area (or, if data is transferred outside of the EEA, then measures have been taken in accordance with data protection law to ensure that the data remains secure, e.g. privacy shield certified).

#### If there is a breach

The GDPR defines a 'personal data breach' as 'a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed'.

As the organiser of a CTT event, if there is a breach, it would most likely be because of one of the following:

- a breach of confidentiality (someone gains access to information who shouldn't have access to it);
- access by an unauthorised third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

Should there be a breach, this must be reported to the Information Commissions Office (ICO) within 72 hours of you becoming aware of it. If you are in any doubt, please contact compliance@cyclingtimetrials.org.uk If there is sufficient time, this can be reported on your behalf. You must also keep a record of any personal data breaches.

# How long to keep the information for

The entrant's personal information provided to you when entering the event should normally be retained for a period of four years following the date of the event and in the event of an accident in an event involving a competitor who is aged under 18 years for the period of four years from and including that competitor's 18<sup>th</sup> birthday. This is needed should there be a claim made against a competitor or other person associated with such event. It is recommended that should there be an accident involving a competitor under the age of 18 years that all the relevant information and documents are sent to the National Secretary (Legal & Corporate) who will retain these on your behalf.

#### **CTT Data Privacy Notice**

Please ensure that you are familiar with this so that you can understand how CTT protects and how it uses personal data. A copy can be found on the CTT website:

https://cyclingtimetrials.org.uk/articles/view/318

**Information Commissioners Office (ICO)** 

If you would like to see more information about the GDPR, please visit the ICO website: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/</a>

#### **How to contact CTT**

If you are uncertain about what this means or what your obligations as an organiser are, please email compliance@cyclingtimetrials.org.uk or write to us at National Secretary (Legal & Corporate), Cycling Time Trials, c/o Nick Sharpe, Wash Farm, Wash, Chapel-en-le-Frith, High Peak, SK23 0QW.