

Apollo Sports Camps Data Protection and Privacy Policy

This is our publicly accessible privacy policy that complies with 2018 GDPR. This policy will be reviewed either annually; and when needed in line with government regulations. We have reviewed the purposes of our processing activities and selected the most appropriate lawful basis, which is consent. We have checked that the processing and storing of the information we ask for is necessary for the relevant purpose and are satisfied that there is no other reasonable way to achieve our purpose. We have documented our decision on which lawful basis applies to help us demonstrate compliance. We have included information about both the purposes of the data we collect and the lawful basis in our privacy notice. Where we process special category data, we have also identified a condition for processing special category data; and have documented this. Where we process criminal offence data, we have also identified a condition for processing this data; and have documented this. Consent as a lawful basis allows you the data provider to withdraw consent at any time, however consent cannot be erased from prior activities.

Your Data

Apollo Sports stores the following information on our system to ensure we have access to children's necessary medical information, emergency contact and have consent to perform first aid.

- Medical information including medication taken, allergies, injuries and asthma.
- Emergency contact names of two adults over the age of 18 for each child.
- Emergency contact numbers of two adults over the age of 18 for each child.
- Email address of at least one adult for each child.
- Signature to say first aid can be performed on child.

Apollo Sports stores the following information to ensure children are grouped correctly on camp and to send out relevant information that is limited to our camps and coaching.

- Address of child.
- Date of Birth of child.
- School of child.

Apollo Sports stores parents/guardians' signatures for the purpose of consent for the following.

- To confirm payment.
- To confirm agreement with our waiver form.
- To agree with their child/children having pictures taken on camp.
- To agree to first aid delivery and medication delivery.
- To confirm D.OB. name, address and emergency contact details are correct.

Apollo Sports stores pictures of campers for promotional purposes. These pictures are stored on a secure work phone and transferred to a secure laptop. These images are then

destroyed on the phone but may be kept up to five years on the secure laptop for promotional use only.

Apollo Sports does not share any of this information with any third parties and destroys any information when it is no longer needed for any of the above purposes. Parents/Guardians have the right to ask for their information to be deleted off our system at any time. If a child is still on camp at the point of requested deletion, parent/guardian must remove child from the camp before deletion is completed. All data is processed through a secure laptop which has security updates regularly to protect data. The information does not get sent anywhere else and is only transferred from the laptop to a paper copy when needed for camp purposes, the paper copy is then shredded and destroyed after use.

Accountability and Management

Apollo Sports has an appointed Data Protection Officer, who is responsible for creating awareness among decision makers about GDPR guidance. Any sub-processors are employed by Apollo Sports, and are made aware of GDPR and data protection procedures. All technical security is reviewed regularly; and technical security is up to date. If Apollo Sports had a breach of data we would report this within 72 hours to the Local Authority, the persons data involved would also be made aware, alongside the consequences and countermeasures taken; unless data was encrypted. There is a contract between Apollo Sports and our hosting providers, that confirms data is in the sole control of Apollo Sports.

New rights

Customers have the right to easily request access to their personal information, easily request its deletion and easily request for it to be sent to a third party. Customers can easily contact us to update their data when necessary. Customers can easily request for their data to stop being processed by Apollo Sports.

Consent

Apollo Sports confirms it is just as easy for customers to give consent as it is to revoke their consent, either fully or in parts. We, then have the right to withdraw a camper from camp if a partial withdrawal of consent compromises their safety with us; and/or our strict policies. Our processing is based on consent and we accept that consent must be freely given, specific, informed and revocable. As we process children data we must verify their age and contain adult consent before they can be involved in any activities under our supervision; or before any data is processed.

You as a customer and legal parent/guardian consent and agree to our data protection and privacy policy when signing up to Apollo Sports Camps.

Review

We will regularly update and review our policy to comply with government GDPR guidelines.
We will review this data policy for changes, effectiveness and changes in handling data.
When this policy is updated or changed, we will inform existing customers.

Data protection and Privacy Policy implement June 2018.
To be reviewed if nothing changes June 2019.

Created in line with GDPR 2018 guidance and by owner and DPO Hannah Smee.

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