



The European Court of Justice has set out a three-part test to assess whether data is being processed in line with legitimate interests or not:

1. Is there a legitimate interest behind the processing?
2. Is the processing necessary for that purpose?
3. Is the legitimate interest overridden by the individual's interests, rights or freedoms?

### **3. Our commitment to data protection**

Through appropriate management, and strict application of criteria and controls, SR will:

- observe fully the conditions regarding the fair collection and use of information;
- meet its legal obligations to specify the purposes for which information is used;
- collect and process appropriate information, only to the extent that it is needed to fulfil operational needs or to comply with any legal requirements;
- take all reasonable steps to ensure the quality of information used;
- apply checks to ensure that personal information is not held any longer than is required for the purposes for which it was obtained;

In addition, SR will ensure that:

- responsibility for data protection is assigned to a designated post holder in the organisation;
- everyone processing personal information on SR's behalf understands that they are contractually responsible for following good data protection practice;
- methods of processing personal information are clearly communicated within SR;
- staff processing personal information are appropriately trained to do so;
- staff processing personal information are appropriately supervised;
- queries about its processing of personal information are promptly and courteously dealt with;
- its methods of processing personal information are regularly assessed and evaluated;
- performance in processing requests for personal information under the GDPR is regularly monitored and evaluated;
- all reasonable steps are taken to guarantee that any "data processor" that SR uses has appropriate technical and organisational security measures in place to safeguard personal information.

#### 4. Data control

Collecting specific, relevant personal information is a necessary part of us being able to provide you with any services you may request from us or just managing our relationship with you.

When we hold or use your personal information as a data controller (rather than as a data processor) we will abide by our privacy notice which sets out the details we collect, how we keep your data secure and our processes when administering a case.

A data controller is a person who controls how personal information is processed and used. A data processor is a person who processes and uses personal information in accordance with the instructions of a third party, i.e. the data controller.

In most cases Sport Resolutions will be a data controller of your personal information.

As a data controller we are required to publish a privacy notice which details how we process your personal information. Where we process your personal information as a data processor for a third party, that third party should provide you with a privacy notice which will set out details regarding the processing of your personal information, which should also include the processing to be carried out by us on their behalf.

#### 5. Types of data we collect

##### Google Analytics

When someone visits [www.sportresolutions.co.uk](http://www.sportresolutions.co.uk) we use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website.

##### Mailing List

As part of the registration process for our e-newsletter, we collect personal information. We use that information for a couple of reasons: to update you on our investigations, events, seminars, decisions and developments; to bring you relevant news from the sector; to contact you if we need to obtain or provide additional information; to check our records are right and to check every now and then that you're happy and satisfied. We don't rent or trade email lists with other organisations and businesses.

We use a third-party provider, MailChimp, to deliver our newsletter. We gather statistics around email opening and clicks using industry standard technologies to help us monitor and improve our e-newsletter. For more information, please see MailChimp's [privacy policy](#).

You can unsubscribe to general mailings at any time of the day or night by clicking the unsubscribe link at the bottom of any of our emails.

## **Ticketing Data**

We use a third-party provider, Eventbrite, to sell tickets for our events. When you purchase a ticket (or tickets) or a handbook (or handbooks) through Eventbrite your full name, address data, job title, company, ticket details, email and contact number will be stored in our system. Please be assured that we do not share your personal details with any other company.

For some more information please see Eventbrite's [privacy policy](#).

## **Cookie Policy**

*What is a cookie?*

Cookies are files which contain a small amount of information. They are stored on the browser or hard drive of your computer or device. Cookies do lots of different jobs, like letting you navigate between pages efficiently, storing your preferences, and generally improving your experience of a website. Cookies make the interaction between you and the website faster and easier.

*What type of cookies do we use?*

Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

Statistic cookies help us to understand how visitors interact with our website by collecting and reporting information anonymously.

Marketing cookies are used to track visitors across websites. The intention is to display content/ads that are relevant and engaging for the individual user.

*What kind of information do we collect by using cookies?*

When someone visits [www.sportresolutions.co.uk](http://www.sportresolutions.co.uk) we collect standard internet log information and details of visitor behaviour patterns. We do this to find out information such as the number of visitors to the various parts of the site. We collect this data in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting any of our websites. We will not associate any data gathered from this site with any personally identifying information from any source. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

*How do I turn cookies off?*

Most browsers allow you to refuse cookies. You may block our cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. You can find out more about cookies and how to delete and control them on [www.aboutcookies.org](http://www.aboutcookies.org) or click help in your browser menu.

## **6. Information We Receive Whilst Administering a Case**

Sport Resolutions can only provide a service to parties when it has the jurisdiction to do so. This can be conveyed either by agreement of the parties or by the operation of an applicable rule or policy to which the individual has agreed to be bound.

In order to administer any process it will be necessary to receive information that is likely to contain personal data. We will take appropriate measures to ensure that this data is kept private and confidential. The lawful basis by which we process any data is legitimate interest.

The rules by which Sport Resolutions receive jurisdiction may contain a requirement to publish any decision or award (such as the UK Anti-Doping Rules). We will only so publish if the applicable rules mandate such an approach.

## **7. How we use your information**

We will use your personal information as described in our privacy notice but we may use your personal information to administer any account(s) you have with us or to send you information we think you might find useful, provided you have indicated that you are happy to be contacted for these purposes.

## **8. Who we share your information with**

We will only share your information with others if it is required to provide you with the services we provide. In such circumstances, we will put in place arrangements to protect your personal information. Outside of that we do not disclose your personal information unless we are required to do so by law.

If we transfer personal information about you outside the European Economic Area (EEA), we will let you know and ensure that all reasonable security measures are taken and that any third party processors will be required to process the information in accordance with information protection laws and we will notify you in your privacy notice if we are the information controller.

We do not sell, trade or rent your personal information to others.

## **9. How long we hold onto your information for**

We will only hold your information for as long as is necessary. If you ask us to delete records, we may delete it earlier.

The duration for which we retain your personal information will differ depending on the type of information and the reason why it was collected. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained for at least six years in accordance with usual commercial practice and regulatory requirements.

With regards to our decisions; once any stipulated period has elapsed, such as the sanction being served, any decision will be removed from the public domain.

From that point, any case, decision or award will be anonymised so as to protect the identity of any individual.

## **10. How we keep your information secure**

We take reasonable and appropriate measures to ensure that your personal information is kept private and confidential. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and to help ensure that your data is safe, secure, and only available to you and to those with authorized access.

However, due to the open nature of the internet, Sport Resolutions cannot guarantee that personal information will not be intercepted or otherwise.

Please keep in mind that, our privacy policy does not cover the links within this site that take you to other websites. We encourage you to read the privacy statements on the other websites you visit.

## **11. Unsubscribe**

We may wish to provide you with information about special features of our website or other services or products we think may be of interest to you. If you would rather not receive this information, please send an email to [resolve@sportresolutions.co.uk](mailto:resolve@sportresolutions.co.uk) with the word 'Unsubscribe' in the subject line and your name and the related email address.

You can also unsubscribe to general mailings at any time by clicking the unsubscribe link at the bottom of any our newsletters.

If we amend our privacy policy, any changes will be published on this web site. Please contact Sport Resolutions if you have any queries or comments regarding our privacy policy.

## **12. Your rights under the GDPR**

You have certain rights in relation to your personal information, for example the right to be provided with the personal information held about you and details of its use. You are also entitled to ask us to correct, delete or update your personal information. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contact us" section below.

You should note that some of your rights may not apply as they have specific requirements and exemptions which apply to them and they may not also apply to personal information recorded and stored by us.

### 13. Complaints procedure

If you are dissatisfied with SR's response to your request for information you may discuss the decision with the person who dealt with your request. However, if this informal discussion does not resolve your complaint, you may submit your complaint in writing to the Chief Executive, either by e-mail to [resolve@sportresolutions.co.uk](mailto:resolve@sportresolutions.co.uk) or by post to the following address:

The Chief Executive  
Sport Resolutions (UK)  
1 Salisbury Square  
London  
EC4Y 8AE

The Chief Executive will consider your complaint and will confirm his final decision in writing to you.

If you are dissatisfied with the Chief Executive's decision, you have the right to apply to the Information Commissioner or your local data protection regulator for a decision as to whether SR has dealt with your request for information in accordance with the requirements of the GDPR. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to help and would encourage you to contact us to resolve your complaint first.

### 14. Contact us

You can submit your request to the Chief Executive by e-mail ([resolve@sportresolutions.co.uk](mailto:resolve@sportresolutions.co.uk)) or to the following address:

Sport Resolutions (UK)  
1 Salisbury Square  
London  
EC4Y 8AE

Sport Resolutions Secretariat: 020 7036 1966

<b>Last review (date)</b>	<b>August 2018</b>
<b>Reviewed by (name)</b>	<b>Audit &amp; Risk Committee</b>
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