



# TENCHI RYU PRIVACY POLICY

## 1. INTRODUCTION

- 1.1 We are committed to safeguarding the privacy of our website visitors and members; in this policy we explain how we will handle your personal data.
- 1.2 By using our website and agreeing to this policy, you consent to our use of cookies in accordance with the terms of this policy.

## 2. CREDIT

- 2.1 This document was created using a template from SEQ Legal (<http://www.seqlegal.com>).

## 3. HOW WE USE YOUR PERSONAL DATA

- 3.1 In this Section 3 we have set out:
  - (a) the general categories of personal data that we may process;
  - (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
  - (c) the purposes for which we may process personal data; and
  - (d) the legal bases of the processing.
- 3.2 We may process data about your use of our website and services ("**usage data**"). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and

website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system . This usage data may be processed [for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring and improving our website and services.

- 3.3 We may process your account data ("**account data**").The account data may include your name and email address. The account data may be processed for the purposes of operating our website, providing our services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is consent and/or our legitimate interests, namely the proper administration of our website and business and/or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.4 We may process your information included in your personal profile on our website and / or our membership web site ("**profile data**"). The profile data may include your name, address, telephone number, email address, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details, grading information, coaching qualifications, medical and emergency contact information. The legal basis for this processing is consent and/or our legitimate interests, namely the proper administration of our website and club activities and services and / or the performance of a contract between you and us and/or taking steps, at you request, to enter into such a contract]
- 3.5 We may process information that you post for publication on our website or through our services ("**publication data**"). The publication data may be processed for the purposes of enabling such publication and administering our website and services. The legal basis for this processing is consent and/or our legitimate interests, namely the proper administration of our website and business and/or the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- 3.6 We may process information contained in any enquiry you submit to us regarding products and/or services ("**enquiry data**"). The enquiry data may be processed [for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is consent by way of a request for further information and/or opting in to receive communications from us.
- 3.7 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website ("**transaction data**"). The transaction data may include your contact details, your card details and the transaction details. The transaction data may be processed for the purpose of supplying the purchased goods and services and keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a

contract and our legitimate interests, namely our interest in the proper administration of our website and business].

- 3.8 We may process information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters ("**notification data**"). The notification data may be processed[for the purposes of sending you the relevant notifications and/or newsletters. The legal basis for this processing is consent and / or performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and / or the renewal of your membership with us.
- 3.9 We may process information contained in or relating to any communication that you send to us] ("**correspondence data**"). The correspondence data may include the communication content and metadata associated with the communication. Our website will generate the metadata associated with communications made using the website contact forms. The correspondence data may be processed for the purposes of communicating with you and record-keeping. The legal basis for this processing is our legitimate interests, namely the proper administration of our website and business and communications with users.
- 3.10 In addition to the specific purposes for which we may process your personal data set out in this Section 3, we may also process any of your personal data where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.
- 3.11 Please do not supply any other person's personal data to us, unless we prompt you to do so.

#### 4. PROVIDING YOUR PERSONAL DATA TO OTHERS

- 4.1 We may disclose your personal data to any authorised member of our organisation insofar as reasonably necessary for the purposes set out in this policy.
- 4.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.
- 4.3 We may disclose your personal data to our suppliers or subcontractors insofar as reasonably necessary for managing your membership of our organisation.
- 4.4 Financial transactions relating to our website and services may be handled by our payment services providers, [e.g. PayPal]. We will share transaction data with our payment services providers only to the extent necessary for the purposes of processing your payments, refunding such payments and dealing with complaints and queries relating to such payments and refunds. You can find information about the payment services providers' privacy policies and practices at :

- 4.5 In addition to the specific disclosures of personal data set out in this Section 4, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 5. INTERNATIONAL TRANSFERS OF YOUR PERSONAL DATA

- 5.1 In this Section 5, we provide information about the circumstances in which your personal data may be transferred to countries outside the European Economic Area (EEA).
- 5.2 The hosting facilities for our website are be situated in the United States of America and our hosting organisation has assured us that they adhere to the principles and requirements of the GDPR
- 5.3 You acknowledge that personal data that you submit for publication through our website or other services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others. Facebook have issued a response to the GDPR which can be viewed here: [http://ec.europa.eu/justice/news/consulting\\_public/0006/contributions/not\\_registered/facebook\\_en.pdf](http://ec.europa.eu/justice/news/consulting_public/0006/contributions/not_registered/facebook_en.pdf). If you are unhappy with Facebook's approach to GDPR then you should cease using this platform to engage or communicate with Tenchi Ryu and/or its members.

## 6. RETAINING AND DELETING PERSONAL DATA

- 6.1 This Section 6 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.
- 6.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 6.3 We will retain and delete your personal data as follows:
- (a) your general membership information will be usually retained for up to 6 years following the expiry date of your membership or up to 6 years after the date of your 18<sup>th</sup> birthday, at the end of which period it will be deleted from our electronic and manual systems.

We also retain a traditional hand-written grading register which contains names and dates of grades awarded. You may request us to redact your name from this register.

- 6.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:
- (a) the period of retention of membership data will be determined based on any ongoing legal disputes or claims underway or anticipated.
- 6.5 Notwithstanding the other provisions of this Section 6, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

## 7. AMENDMENTS

- 7.1 We may update this policy from time to time by publishing a new version on our website.
- 7.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 7.3 We may notify you of changes to this policy by email or other messaging system on our website or membership page.

## 8. YOUR RIGHTS

- 8.1 In this Section 8, we have summarised the rights that you have under data protection law. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.
- 8.2 Your principal rights under data protection law are:
- (a) the right to access;
  - (b) the right to rectification;
  - (c) the right to erasure;
  - (d) the right to restrict processing;
  - (e) the right to object to processing;
  - (f) the right to data portability;
  - (g) the right to complain to a supervisory authority; and
  - (h) the right to withdraw consent.
- 8.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the

processing, the categories of personal data concerned and the recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data. The first copy will be provided free of charge, but additional copies may be subject to a reasonable fee. Any member of our organisation can access their personal data] by logging in to their personal page at [membermojo.co.uk](http://membermojo.co.uk). Every reasonable assistance will be given to those who do not have access to the world wide web.

- 8.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.
- 8.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include: the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; you withdraw consent to consent-based processing; the processing is for direct marketing purposes; and the personal data have been unlawfully processed. However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary: for exercising the right of freedom of expression and information; for compliance with a legal obligation; or for the establishment, exercise or defence of legal claims.
- 8.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are: you contest the accuracy of the personal data; processing is unlawful but you oppose erasure; we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and you have objected to processing, pending the verification of that objection. Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it: with your consent; for the establishment, exercise or defence of legal claims; for the protection of the rights of another natural or legal person; or for reasons of important public interest.
- 8.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for: the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or the purposes of the legitimate interests pursued by us or by a third party. If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- 8.8 You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

- 8.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.
- 8.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.
- 8.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.
- 8.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.
- 8.13 You may exercise any of your rights in relation to your personal data by written notice to us.

## 9. ABOUT COOKIES

- 9.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.
- 9.2 Cookies may be either "persistent" cookies or "session" cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.
- 9.3 Cookies do not typically contain any information that personally identifies a user, but personal information that we store about you may be linked to the information stored in and obtained from cookies.

## 10. COOKIES THAT WE USE

- 10.1 We may use cookies for the following purposes:
- (a) authentication – we may use cookies to identify you when you visit our website and as you navigate our website
  - (b) status – we may use cookies [to help us to determine if you are logged into our website;

- (c) personalisation – we may use cookies to store information about your preferences and to personalise the website for you];
- (d) security – we may use cookies as an element of the security measures used to protect user accounts, including preventing fraudulent use of login credentials, and to protect our website and services generally;
- (e) advertising – we may use cookies to help us to display advertisements that will be relevant to you or which are displayed by service providers as part of our agreement with them (usually by way of obtaining cheaper services);
- (f) analysis – we may use cookies to help us to analyse the use and performance of our website and services; and
- (g) cookie consent – we may use cookies to store your preferences in relation to the use of cookies more generally.

## 11. COOKIES USED BY OUR SERVICE PROVIDERS

- 11.1 Our service providers may use cookies and those cookies may be stored on your computer when you visit our website.
- 11.2 We may use Google Analytics to analyse the use of our website. Google Analytics gathers information about website use by means of cookies. The information gathered relating to our website is used to create reports about the use of our website. Google's privacy policy is available at:  
<https://www.google.com/policies/privacy/>. [The relevant cookies are: *identify cookies*.]
- 11.3 We use membermojo.co.uk to manage our membership information. This service may use cookies and you can view the privacy policy of this service provider at <https://membermojo.co.uk/mm/help/privacy>

## 12. Managing cookies

- 12.1 Most browsers allow you to refuse to accept cookies and to delete cookies. The methods for doing so vary from browser to browser, and from version to version. You can however obtain up-to-date information about blocking and deleting cookies via these links:
  - (a) <https://support.google.com/chrome/answer/95647?hl=en> (Chrome);
  - (b) <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences> (Firefox);
  - (c) <http://www.opera.com/help/tutorials/security/cookies/> (Opera);
  - (d) <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies> (Internet Explorer);

- (e) <https://support.apple.com/kb/PH21411> (Safari); and
- (f) <https://privacy.microsoft.com/en-us/windows-10-microsoft-edge-and-privacy> (Edge).

12.2 Blocking all cookies will have a negative impact upon the usability of many websites.

12.3 If you block cookies, you may not be able to use all the features on our website.

## 13. OUR DETAILS

13.1 This website is owned and operated by Tenchi Ryu

13.2 We are registered as a Community Amateur Sports Club.

13.3 Our principal place of business is at 1 Mill Lane, Barnstaple, Devon EX31 1JQ

13.4 You can contact us:

- (a) by post, using the postal address given above
- (b) by telephone, using the contact number published on our website from time to time; or
- (d) by email, using the email address published on our website from time to time.

## 14. DATA PROTECTION QUERIES

14.1 Please use the contact details as shown in 13 above.