



England Kabaddi Union - Privacy Policy

Last updated: 20 January 2023

In this Privacy Policy, terms such as "we", "us", "our" or similar expressions shall mean England Kabaddi Union (EKU) and any use of the words "you", "yours" or similar expressions shall mean any user of this website whatsoever.

This Privacy Policy explains what personal data we collect when you: access the England Kabaddi Union website at www.Englandkabaddi.com; or engage with us on social media platforms; or attend / play at tournaments, trainings or matches with EKU; or attend EKU events; and/or when you otherwise interact or communicate with us (our Services). It also explains how we may use this data, and what rights you have in relation to such data.

Please read this Privacy Policy carefully:

1. Background

Under the General Data Protection Regulations (GDPR), we are a "Data Controller". This means that we are responsible for deciding how we use the personal data that we collect about you and, in accordance with the Data Protection Law, we will ensure that the personal data we hold about you is, at all times:

- used fairly, lawfully, and transparently;
- collected for specific purposes only; and
- adequate, relevant to, and limited to what is necessary for those purposes.

We shall be accountable for and able to demonstrate our compliance with our obligations under the Data Protection Law, and this Privacy Policy is one of the ways in which we do that.

2. Personal Data we collect from you

- **Registration Data:** To access and use some elements of the Services you have to provide us with the following information which is identified on the relevant registration page: name, email, date of birth, and nationality. We may also collect a username and password if account registration is required. Please note that some elements of the Services will not be available if you do not provide the required information. We may also ask or allow you to submit other optional information, including your gender, phone number, UK postcode.

- **Banking, Payment and Billing Data:** You will have to provide your payment information in order to make purchases on the website.
- **Identity Data:** We also ask you to provide identification information when we provide other elements of the Services: name, age, gender and social media handles/ usernames. For example, we may ask for your identity data for trainings, tournaments or matches.
- **Contact Data:** When we want to communicate with you, or you with us; we use your email address, telephone numbers, social media handles/ usernames and location (country/ place of residence).
- **Media Data:** We use images from photographs and video footage of players, spectators, and fans, and other media content created by us (or on our behalf) at ECU events, trainings, matches and tournaments, or provided by you for our use.
- **User Data:** We collect your usage and preference details related to your use of the Services such as language, game-play statistics, scores, rankings, time spent playing, game profile, preferences (including favourite Clubs), survey responses, feedback and other data that you provide to us as part of your account.
- **Marketing and/ or Communications Data:** We retain your preferences in receiving marketing messages from us and our Clubs and commercial partners, and your communication preferences.
- **Technical Data:** Certain data is automatically generated and collected by us when you use the Services such as your IP address, MAC address and other device identifiers; your clickstream to, through and from the Services (including date and time); pages you viewed or searched for; length of visits to certain pages; page interaction information (such as scrolling, clicks, and mouse-overs); methods used to browse away from the page.

Not all of the list above will necessarily apply to you - it depends on your use of the Services and your particular interaction and communications with us.

3. How we collect your Personal Data

You provide us with your personal data when you:

- Access or use our website;
- create an account on our website;
- request information, marketing and other communications to be sent to you;
- enter a competition, promotion or survey;
- attend events organised by us;

- attend trainings, tournaments and matches with us;
- complete surveys or provide us with your feedback; and
- otherwise interact or correspond with us (including via email, social media or telephone).

In connection with some elements of the Services, we also receive additional personal data about you from other organisations who have collected personal data from you, such as our partner Kabaddi clubs (Clubs), other Kabaddi organisations, our commercial partners and data collected on our behalf at EKU events. We may also receive personal data as part of the legal processes we undertake to protect our Services and our intellectual property, such as our brand or media rights, or those of our licensees/commercial partners.

We collect the Technical Data automatically as you interact with our Services by using cookies and other similar web technologies.

We also use third party tools to help us manage and analyse our website, our social media presence, and report on comments, mentions and other content that is posted about us on social media sites and other public channels and forums. These third parties' activities, and their information collection and sharing practices, are subject to the terms of the relevant social media site, channel or forum. We will use this information in accordance with this Privacy Policy.

We use third party services such as, Google Workspace (along with the applications used therein) and Wix, to store and manage data collected from you. Please refer to their privacy policy at <https://policies.google.com/privacy> and <https://www.wix.com/about/privacy> for more information.

4. How and why we use your Personal Data

We will only use your personal data where Data Protection Law allows us to. Data Protection Law says we can collect and use personal data on the following bases:

- it is necessary for us to be able to perform an agreement with you.
- it is necessary for our legitimate interests (and your interests and fundamental rights do not override those interests);
- if we have your consent (which you can withdraw at any time); or
- to comply with a legal obligation e.g. rules laid down by courts, statute or regulation.

Accordingly, we lawfully use your personal data in the following ways:

- Delivering the Services
- Competitions and promotions
- Marketing
- Media coverage

- Other purposes: We could have to use your personal data which we hold to protect your or someone else's vital interests for example to make contact in rare emergency situations. We could also have to use your personal data in connection with legal and regulatory matters such as our maintenance of business records, compliance with external reporting requirements and internal policies and procedures and responses to requests by government, law enforcement, regulators, courts, rights holders or other third parties including in respect of the use or misuse of intellectual property, such as our brand or media rights, or those of our licensees/commercial partners or their parties. Therefore we use this data on the basis that it is necessary both for our legitimate interests in protecting, defending and enforcing rights and interests in this way and also so that we can comply with legal obligations.

We will only use your personal data for the purposes for which we collected it as described above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

You can withdraw your consent and opt-out of marketing communications from us at any time by emailing us at contact@kabaddiengland.co.uk.

Unless otherwise specified above, generally we collect your personal data on a voluntary basis. However, please note that if you decline to provide certain mandatory personal data, you may not be able to access certain Services and we may be unable to fully respond to any inquiries you make.

5. Disclosure of your Personal Data

We may disclose or share your personal data in the following circumstances:

- Third Party Service Providers. We engage third party businesses to provide services to us or to you on our behalf, such as support for the internal operations of our Services (and related services), communications, data storage and delivering communications (including calendar notifications). In providing their services, they may access, receive, maintain or otherwise use personal data on our behalf. The third party service providers are mentioned above and their use of your Personal Data is dictated by their privacy policies.
- Commercial Partners. We may also disclose your personal data to our commercial partners where you have consented or requested that we do so. For example, when you enter a competition or sweepstake which is a joint promotion, or you request to receive certain marketing communications. You will be given clear information in each case before we disclose share your personal data.

- **Publicity and media.** We may disclose your personal data publicly via the media, social media or on the Services. For example, when sharing a comment or opinion you have provided such as when you contact the EKU on social media posts, or if you win a competition or promotion we may disclose your name online. In such cases, we will clearly notify you of the sharing, and you will have the choice not to participate.
- **Training / Match spaces or event / tournament organisers.** We may disclose your personal data when we attend or organise trainings, tournaments, matches or events, to the organisers and locations.
- **Clubs.** Where you allow us to, we will share your personal data with your favourite Clubs to help our Clubs interact with their fans. This Privacy Policy applies to our use of your personal data only, and you should refer to the relevant privacy policy of each relevant Club to understand how they use your personal data. All of which are available here.
- **Legally Required.** We may also disclose your personal data if we believe we are required to do so by law, or that doing so is reasonably necessary to comply with legal processes or in the event of a re-organisation of the legal or ownership structure of the England Kabaddi Union.

Notwithstanding anything else in this Privacy Policy, we may share aggregate or de-identified information with third parties for research, marketing, analytics and other purposes, provided such information does not identify a particular individual and the individual cannot be re-identified.

6. Transferring your Data outside the EU

Some countries outside of the European Union (EU) do not have laws that protect privacy rights and personal data as extensively as the UK and other countries within the EU. We do not generally or routinely transfer personal data outside of the EU but some of the organisations to which we may disclose personal data may be situated outside of the EU.

7. Security of Your Personal Data

Your Personal Data is limited to be accessed by members of the committee working in the EKU and authorised entities who have a need to know as provided in this Policy. They will only use your personal data on our instructions.

We will notify you and any applicable regulator where we are legally required to do so in case of any breach.

Where we have given you or you have chosen a password which enables you to access certain Services, you are responsible for using reasonable care in keeping this password confidential.

8. Links to other websites

The Services may contain links to other websites, applications and environments that are not owned or controlled by us (the Other Sites). The owners and operators of those Other Sites are responsible for their collection or use of your personal data and you should check their respective privacy policies. Unless specifically referred to otherwise, this Privacy Policy applies to the Services only and not the Other Sites.

9. Data Retention

We will only keep your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any accounting, reporting or other legal requirements, in accordance with our Data Retention Policy.

10. Your Rights

Under Data Protection Law, you have certain rights (depending on the circumstances) in connection with your personal data, which include:

- Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are using it lawfully, provided always that this does not adversely affect the rights and freedoms of other people;
- Request correction of the personal data that we hold about you. Where any of the information we hold about you is incorrect or incomplete we will act promptly to rectify this, including where you have requested us to do so.;
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to use it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to our use (see below);
- Object to the use of your personal data where we are relying on our legitimate interests (see above) and there is something about your particular situation which makes you want to object to our use on this ground;
- Withdraw your consent to our use of your personal data where we do so in reliance on your consent. Once we have received notification that you have withdrawn your consent, we will no longer use your personal data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law;
- Request the restriction of use of your personal data. This enables you to ask us to suspend the use of personal data about you, for example if you want us to establish its accuracy or the reason for using it; and

- Request the transfer of the personal data you have provided, on the basis of consent or for a contract with us, to you or a third party where technically feasible.

We are committed to respecting your rights. You may action your rights (as may be applicable) by contacting us using the details provided and we will comply with your requests within a reasonable period unless we have a lawful reason not to do so.

Requests should be made in writing and to ensure that personal data is dealt with carefully and confidentially we will require the requestor to provide verification of their identity and all applications must be accompanied by copies of at least two official documents, which show your name, date of birth and current address (for example, driving licence, birth/ adoption certificate, passport, recent utility bill).

In responding to such requests, we will explain the impact of any objections, restrictions or deletions requested.

We will not charge you a fee to exercise your rights unless your request is clearly unfounded or excessive, in which case we may charge you a reasonable fee. Alternatively, we may refuse to comply with the request in such circumstances.

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK data protection authority.

11. Children and Privacy

We encourage parents and guardians to supervise their children's online activities by, for example, adopting control tools available from online services and software suppliers that help provide a child-friendly online environment including by preventing children from disclosing their personal data online without parental permission.

You have to be aged 13 or above to avail the Services offered by the Eku.

12. Contact Us

If you have any questions about this Privacy Policy or how we handle your personal data, please contact us using the following contact details:

Email: contact@englandkabaddi.com