Manx Timing Solutions

Data Protection Policy for Event Organisers and Participants

Version 1 : 20th May 2018

What Personal Data do we capture and why do we need it?

Manx Timing Solutions provide a professional Timing and Results service for sporting and other events.

Additionally, we provide and manage online entry facilities to enable the capture of participant details that are required to support the management of event participants; including essential communications with the participant before, during and after the event.

We capture and store information pertaining to participants in all events for which we provide timing and results services. This may be provided to us in spreadsheet format by the organiser or, where we are also managing online entry on their behalf, this will be directly captured via a secure web form and transmitted directly to a database.
In most cases, we make use of the Race Result platform which is hosted on secure servers that are managed by Race Result and located in Germany.

We only capture data that is relevant to the purpose of event management and results production. This falls into three categories:

Category 1: Essential permanent information required for results / auditing.

- Name / Gender / Date of Birth: This is essential for assigning results to an individual and deriving the correct age/gender category for results.
- Town /City / Country of residence / Nationality: Although not essential for results production, some events will include this information on published reports as it of interest to the public.
- Club / Team: Many events show the participant club and/or team. May be used for amalgamating team results or simply to include the club as additional information on results.
- Affiliation / Licence: Some event organisers require that the participant declare affiliation to a governing body and/or license number.
- Contact details - Address / Phone Numbers / Email address. Used for any event-related correspondence by Mail / SMS / Email etc and, where necessary, direct contact in order to resolve result queries and/or to recover missing timing chips, restore lost property, etc.
  Event organisers may also send communications to participants relating to the event. Typical content will be information about the event such as briefing notes.
- Palmares: For some events, the participant is asked to provide details of past performances or achievements. This may be used by the organiser to identify participants with prior track record (e.g. for seeding) or by race commentators to add background to commentary.
- Financial details pertaining to event entry: Most events require payment of an entry fee and the system holds details of the amount paid, date of payment, method of payment.
  Actual payment is managed via a secure third party payment interface.
  Details of credit/debit card numbers, pin numbers, verification codes etc are not stored within the system or accessible to either the event organiser or Manx Timing Solutions.

Category 2 - Ad-Hoc non-personal information

Includes any non-personal information that may be relevant to a particular event.

- Clothing size - where [e.g.] event T-Shirt, Hoodie etc may be part of the event package.
- Charity / fundraising commitments.
- Other examples of ad-hoc information:
    i. Information provided in order to obtain a discount to entry fees.
    ii. Non-personal analysis information such as "where did you hear about the event".
    iii. Anything else not covered by category 1 and classified as non-personal.

Category 3: Temporary information required for an event

- Next of kin details: Most event organisers (and governing bodies) require that a name and telephone number for an emergency contact/next of kin be captured. This is so that, in the event that a participant is unaccounted for during an event or is involved in a medical incident or accident, they can contact the nominated person to inform them of the situation.
- Parent or Guardian: For events where minors may be participating, the organiser may need to capture the name and contact details for parent/guardian. This is primarily to satisfy requirements laid down by the governing body for the relevant sport where minors are participating.
- Medical condition: Some event organisers require that information relating to any at risk medical condition is known. In the event of a medical emergency, this information may be passed on to paramedics, hospital personnel etc.

Manx Timing Solutions configure online entry to capture information on behalf of the event organiser. Ultimately, the event organiser is responsible for defining exactly what information is captured for their event.

Who we share your personal data with

When we agree to provide Online entry / Timing / Results services for an event organiser, participant data and the management of that data is shared between us and them. This includes category 1, 2 and 3 data.

Where we do not provide online entry for an event, we will normally receive participant details from the organiser in spreadsheet format. In this case, only Category 1 data will normally be shared with us.

Event Organisers (under their own GDPR policy) are advised not to transmit category 2 & 3 participant data in non-encrypted form.

When we provide timing and results services to an event, relevant race timing data associated with the participant will be published via our online results portal.

Event organisers may also post links to participant lists and results from their own web site, facebook page, etc. They may also publish PDF or other copies as appropriate. Results by their nature exist in the public domain and may be reproduced by governing bodies, sports publications, newspapers, magazines etc.

By entering an event, the participant agrees that their name, category etc. details will be included in the results and that this becomes a permanent record.

Importantly, a participant cannot ask for their name or result details to be removed from a set of published results because that would have a deleterious effect not only on their own result but on other participants, teams etc.

Access to participant data relevant to an event is effectively shared between the Event Organiser, Manx Timing Solutions and Race Result.

1. The Event Organiser is responsible for deciding who in their organisation has access to participant data and how it is used and/or shared and should have their own data protection policy in place.

2. Manx Timing Solutions will use participant data primarily for the purpose of capturing and publishing results. If necessary, we may use participant contact details to contact participants directly in order to resolve any queries regarding their entry or results. We may also contact participants in order to arrange recovery of Manx Timing Solutions property – e.g. timing Chips/Transponders etc.

   At the request of the organiser, we may setup and initiate mailshots via email to participants regarding the event. In this case, it is the responsibility of the organiser to ensure that any relevant permission to do so has been obtained.

   Note that Manx Timing Solutions agree NEVER to provide participant data to third parties or use participant details for our own marketing purposes. We do not engage in any direct marketing to event participants.

3. Manx Timing Solutions utilise a secure hosting platform for the storage and processing of event data. Backups and security are managed by the hosting service.

Note that ONLY relevant non-personal data will be included on published lists & results. This may typically include:

1. Name and Race Number
2. Town, Nationality, Country
3. Gender
4. Age and/or category
5. Club / Team details
6. Ranking
7. Result Times, points, awards etc

The following personal details will normally NEVER be included on published results or reports:

1. Address details
2. Date of birth
3. Phone numbers
4. Email addresses
5. Next of kin details
6. Medical details
7. Anything else that may be considered personal and not directly relevant to the event results etc

How long do we hold your personal data

Results from events are permanent and thus any information captured for the purpose of compiling results is retained indefinitely. All category 1 data is considered to be permanent.

It should be appreciated by all event participants that event results, once published, constitute an official and historic record that henceforth reside in the public domain. These may be referred to in future for any appropriate purpose including comparisons, course records, etc.

In addition to the results that Manx Timing Solutions may own and publish, the event organiser may make copies of these for posting on their own web site and may also pass copies to the governing body, press, etc for publication in magazines, newspapers etc.

Category 2 data is considered non-personal and will not normally be deleted after the event.

Category 3 data, where captured, is relevant only for the duration of the event and the organiser should request that Manx Timing Solutions delete (blank out) these data items within a reasonable time of the event date. Typically, this should be between one week and one month after the event.

Data retention summary

Category 1 data: Permanent

Category 2 data: Is not considered "personal" and will not normally be removed unless requested by the organiser and where, by doing so, will not materially affect published results or essential financial records.

Category 3 data: Will normally be removed (blanked out) 1 month after the event date.

Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data (other than that which is essential for supporting published results); to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

As Manx Timing Solutions only capture data on behalf of the event organiser, requests should normally be directed to the organiser in the first instance. If the event organiser is unable to provide a satisfactory response then Manx Timing Solutions will agree to assist with a response. However, Manx Timing Solutions may charge the event organiser for the reasonable cost of doing so.

As a data subject you are not obliged to share your personal data with the Event Organiser and/or Manx Timing Solutions / Race Result. If you choose not to share essential personal data with us we may not be able to register or administer your participation in the event.

Appendix 1 - Reference Material

1. Isle of Man Government Website

https://www.eugdpr.org/key-changes.html