



DATA & PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY AND RETAIN A COPY FOR YOUR RECORDS. THIS POLICY FORMS PART OF RETURN2PLAY'S TERMS AND CONDITIONS.

Return2Play Ltd, Bryden Johnson, Lower Coombe St, Croydon CR0 1AA, a company registered in England and Wales with company number 09616661, is registered with the UK's Information Commissioner's Office (ICO) as Data Controller Registration Number ZA155207.

We take your Data Protection seriously and in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and Data Protection Act 2018 (DPA), we have reviewed our policies, processes and security procedures to ensure compliance with these regulations.

This privacy notice is to inform you, our clients, of the types of data we process about you, the reasons for processing your data, the lawful basis for processing, your rights and the retention periods of your data.

We act as Data Controllers for the personal data provided in order to administer the contracts we enter into with our clients or for the data collected using our website www.return2play.org.uk.

We act as Data Processors for data you, our Clients add to and process within our Return2Play platform, with a few exceptions noted in the table in this Privacy Notice.

If you have any questions about your data or how we handle it, please contact us on hello@return2play.org.uk

This privacy policy (Policy), together with our Terms and Conditions, applies to your use of the website at return2play.org.uk (Website) and our the R2P Injury Management System.

DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose



- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for any international transfers of personal data

TYPES OF DATA HELD

Return2Play is a platform where you, our Clients (User, Users, you) can store details of injuries sustained, document their recovery, and linked to participating doctors registered with the UK General Medical Council: www.gmc-uk.org, (the GMC) (known as Practitioners).

RECORD OF PROCESSING ACTIVITIES

We keep a list of our processing activities up to date and publish these on our website.

For a list of our processing activities, the type of data held, the purposes of processing and retention periods please see the following links:

Processing Activities as a [Data Controller](#)

Processing Activities as a [Data Processor](#)

SENSITIVE PERSONAL DATA

In order to deliver our Services, health data will be processed in the Return2Play platform as outlined in our records of processing activities. For most cases, this data has been provided by consent by players or parents of players.

This includes health information collected when injuries are recorded, notes and symptom logs that are added to injury records. This is classed as sensitive personal data under the General Data Protection Regulation.

Information that Practitioners on the Platform record in your online notes (your Electronic Medical Records or EMRs) will include relevant and pertinent information that you have discussed with Practitioners on the Platform.

Such EMRs may also include Practitioners' comments, diagnoses and commentary as well as factual information, medical advice and the symptoms that you have presented with in a session.

Where we process sensitive personal data in our role as a Data Controller, this is outlined in our record of processing activities. In these instances this data is processed based on the vital interests of the players (safeguarding), or under consent.

NEWSLETTERS



We may also use the information you send to us via the Platform and/or Services to communicate with you via email and, possibly, other means, regarding products, services and events we think may be of interest to you or to send you our newsletter, if this is in accordance with your marketing preferences. However, you will always be able to opt-out of such communications at any time (see sections below).

If you contact us, we may keep a record of that correspondence.

Marketing Communications

You can opt-out of receiving certain promotional or marketing communications from us at any time, by using the unsubscribe link in the emails communications we send or by contacting us at hello@return2play.org.uk with the word "UNSUBSCRIBE" in the subject field of the email.

If you have any account for our Services, we will still send you non-promotional communications, like service related emails.

WHO WE SHARE YOUR DATA WITH

DATA PROCESSORS

We have a data processing agreement in place with third parties we use to process your data under our instructions as part of providing our services to you. Third parties must implement appropriate technical and organisational measures to ensure the security and confidentiality of your data.

OTHERS

We may share your data with third parties as part of a Company sale or restructure, or for other reasons to comply with a legal obligation upon us.

- If we are under a duty to disclose or share your Personal Data in order to comply with any legal or regulatory obligation or request.
- In order to:
 - o Enforce or apply the Terms and Conditions or to investigate potential breaches; or
 - o Protect the rights, property or safety of Return2Play, our customers or others.
 - o This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Further, Return2Play is permitted to use and disclose your sensitive personal data for purposes of: (a) treatment; and (b) to enable medical service provision, as follows:

- To Prevent Incidents and Protect You:

Return2Play may use and disclose your Personal Data to the extent required to prevent a serious threat to your health and safety or that of others (including but not limited to instances of child abuse or neglect). In such circumstances Return2Play will



only disclose your Personal Data to public bodies or officials who can help prevent the identified or possible threat.

- To Prevent Public Health Risks:

Return2Play may share your Personal Data for public health activities, as required by departments or parties duly authorised by the UK Government. For example, we may share your Personal Data:

- o To report reactions to medicines or problems with products;
- o If a Practitioner believes that you may have been exposed to, or may be at risk of spreading, certain specified serious diseases or conditions.

- Legal Disputes and Cases:

If you are involved in a legal dispute, Return2Play may share your Personal Data in response to a court order, legal demand or other lawful process.

- The Police:

Return2Play may share sensitive personal data if asked to do so by the police in certain limited circumstances, including reporting of certain types of wounds.

- National Security:

Return2Play may share, if required, your Personal Data with UK Government officials for national security reasons (as permitted by the GDPR).

We do not rent or sell your Personal Data to anyone.

Notices, Amendments and Updates:

We may change this Privacy Policy at any time or substitute this Privacy Policy at our sole discretion. We reserve the right to make any revised policy effective for Personal Data we already have about you as well as any information we receive in the future.

We will post a copy of the updated Policy on our Platform and Website prior to any change becoming effective.

If we make changes, we will notify you by sending you an email notification or by means of a notice on the Platform.

Access/Accuracy

To the extent that you do provide us with personal Information, Return2Play wishes to maintain accurate Personal Data. You may update, correct or delete by yourself your account information by logging into your Account.

If for any reason those means are unavailable or inaccessible, please contact us and we will make reasonable efforts to incorporate the changes in your Personal Data that we hold as soon as practicable.

TRANSFERS OF PERSONAL DATA



We do not transfer your data with bodies outside of the European Economic Area. If in the future, we are required to do so, we will ensure appropriate measures in place are in place to ensure that your data is transferred securely and that the bodies who receive the data that we have transferred process it in a way required by EU and UK data protection laws.

PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse.

As part of our ongoing compliance with GDPR, we have implemented processes to protect your data and will continue to monitor the effectiveness of these processes.

Information on who we protect your data can be provided on request.

If you have any questions about the security of your personal information, you can contact us at hello@return2play.org.uk

LINKS TO OTHER WEBSITES

The Platform may contain links to let you to visit other websites or mobile applications easily. If you click on a link to a third-party site or app, you will leave the Platform and go to the site or app you selected.

Because Return2Play cannot control the activities of third parties, we cannot accept responsibility for the content of any such sites or apps or for any use of your Personal Data by such third parties and we cannot guarantee that they will adhere to the same privacy practices as Return2Play. If you visit a third-party website that is linked to our site, you should read that site's privacy policy before providing any personal information.

AUTOMATED DECISION MAKING

Automated decision making means making decisions about you using no human involvement e.g. using computerised algorithms or programmes.

We do not undertake any automated decisions with your data.

YOUR RIGHTS

You have the following rights, with some restrictions, in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it
- b) the right of access to the data we hold on you



- c) the right for any inaccuracies in the data we hold on you to be corrected (rectified)
- d) the right to have data deleted in certain circumstances (erasure)
- e) the right to restrict the processing of the data
- f) the right to transfer the data we hold on you to another party (portability)
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

You have the right to access your Personal Data. You also may update, correct or delete by yourself your account information by logging into your Account.

You are entitled to access your Personal Data if you are:

- The data subject; or
- A representative of the data subject who has written consent; or
- The parent or guardian of a child under 16 years of age: In cases where the child agrees, or it was in the child's best interest for access to the data to be granted.

We are obliged to ensure that the request has:

- Enough information to identify you (or the data subject).
- Enough information to identify the information sought.

You have the right to appeal against a decision to refuse access to your information. You have the opportunity to either write a letter of complaint or express your complaint orally with a possible satisfactory outcome.

You are also free to contact the Information Commissioner, who is the compliance lead on Data Protection in the UK.

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Tel: 0303 123 1113 (local rate) or 01625 545 74 (national rate)

Web: <https://www.ico.gov.uk>