

# Swim, Bike, Run App Privacy Notice

#### **About Us**

Swim Bike Run is a product of the British Triathlon Federation, whose members are the Home Nation's Associations of Triathlon England, Triathlon Scotland and Welsh Triathlon.

We at British Triathlon have developed an app called Swim Bike Run for use with Smart-Devices and it is available to download from the Apple Store and Google Play.

The Swim Bike Run App, has been created as a new companion to an active outdoor lifestyle, encouraging children, adults and families to get moving and explore the world around them through adventure, challenges and exclusive prizes. In summary, the App is designed to enable you to interact in game worlds blended with information from the real world.

Like all apps, data will be collected when you download and interact with it. British Triathlon (hereafter referred to as "Swim Bike Run") will be the "data controller" of the personal data collected.

We are committed to protecting your privacy, and this privacy notice has been designed to inform you of how we process your personal data, as well as the rights that you have and how you can exercise them.

#### Data Collected and Linked to You

The following data may be collected and linked to your user ID as a user of the Swim Bike Run app.

When you download and play our App:

- Online identifiers from cookies and pixels
- Location and tracking data including latitude and longitude
- Other game metadata

When you enter into a prize competition:

 Contact information in the form of, forename, surname, email address and contact telephone number



This data is required so that we can enter you into the prize draw and contact you if you have won.

### Other data collected and processed but not linked to your identity

The following data might be collected and processed but is not linked to your user ID:

- User content and gameplay content.
- Device identification in the form of device ID, operating system, browser version, MAC address or IP address.

We process your personal data for a number of different purposes. For each purpose, we have identified a lawful basis for processing.

**Contract** – we need to collect information about your device and activity within the App in order to perform our contractual obligation towards to under the App's terms and conditions to:

- Allow you to play the game
- · Track your progress through the game

This information is necessary for the game to function.

**Legitimate Interests** – we also process users' personal data in pursuit of our legitimate interests to:

- Improve and monitor game use
- Ensure the security of the App
- Deal with any questions or concerns from users

# **Consent** – we rely on your consent to:

- Use non-essential cookies for marketing and tracking purposes
- Enter you into the prize draw, where you have signed up to do so

Where we rely on consent to process your personal data, you have the right to withdraw your consent at any time by contacting <a href="mailto:dataprotection@britishtriathlon.org">dataprotection@britishtriathlon.org</a>

# Who we share your personal information with

We may share the data we collect with the following types of organisations:

 Carefully selected third party data processors that process personal data on our behalf. For example, we use Cognition to host the App



In the event that we do share personal information with external third parties, we will only share such personal information strictly required for the specific purposes and take reasonable steps to ensure that recipients shall only process the disclosed personal information in accordance with those purposes.

### Transferral of personal data outside the United Kingdom

Your personal data may be transferred outside of the UK when using third party services.

Where we share your personal data with third parties located in third countries that have not been deemed by the Information Commissioner's Office (ICO) as providing adequate protection, we rely on standard contractual clauses with the UK Addendum to safeguard the transfer.

### How long we keep your personal information

Your information is kept for as long you are registered or using our games, and is deleted from the date you stop interacting with the games.

## Protecting your personal information

Data security is of great importance to Swim Bike Run and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data.

We take security measures to protect your information including:

- Implementing access controls to our information technology;
- Using appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, website and offices; and
- Implementing organisational policies, procedures and training to ensure your personal data is handled safely and responsibly.

# Your rights

You have the right to:

- ask for access to your personal information via a 'subject access request'
- ask for personal information we hold about you to be corrected



- ask for your personal information to be deleted. This enables you to ask us to delete or remove your personal information where there is no good reason for us continuing to process it
- object to the processing of your personal information where we are relying on a legitimate interest, and there is something about your particular situation which makes you want to object to processing it
- ask for the processing of your personal information to be restricted.
  This enables you to ask us to suspend the processing of personal information about you
- ask for your personal information to be transferred to another company

You can exercise any of the following rights by writing to us at **dataprotection@britishtriathlon.org**.

Any requests received by British Triathlon on behalf of Swim Bike Run will be considered under applicable data protection legislation. If you remain dissatisfied, you have a right to raise a complaint with the Information Commissioner's Office at www.ico.org.uk

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