

# **Data Protection Policy**

Dear Athletes, Coaches, Referees and other individuals. As any company or association these days European Tenpin Bowling Federation (ETBF) needs to gather and use certain information about individuals – personal data.

This policy describes how personal data is collected, handled and stored at ETBF to meet the data protection standards set by General Data Protection Regulation (GDPR<sup>1</sup>).

According to ETBF Constitution, ETBF's main office shall be established in the country and city where the President resides, unless provided otherwise by its Presidium. In time of adoption of this Data Protection Policy the main office is in Veghel, The Netherlands.

The competent national supervisory authority is therefore the Dutch Personal Data Authority. More information about the competent supervisory authority and its contact data are available at [www.autoriteitpersoonsgegevens.nl](http://www.autoriteitpersoonsgegevens.nl).

## **1. Definition of Personal Data**

Personal Data means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

The data about national federations, championship hosts, tournament organizers or other legal entities ETBF is cooperating with, might not be personal data in its entirety, if they relate only to a legal entity. However, all data about individuals taking part in these legal entities, constitute personal data which is processed by ETBF according to information given in this Data Protection Policy (following Article 13 and 14 of GDPR).

## **2. Data Protection Principles**

ETBF is committed to processing data in accordance with its responsibilities under the GDPR.

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<sup>1</sup> Regulation (EU) 2016/679 of the European parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing directive 95/46/EC.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

ETBF shall ensure that personal data collected are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed and shall also take reasonable steps to ensure personal data is accurate.

### **3. Purposes of Processing Personal Data**

Personal Data is processed within the activities of ETBF set by ETBF Constitution, for example processing personal data:

- to conduct European Tenpin Bowling Championships for adult and youth members of the ETBF member federations,
- for keeping publicly accessible Archive of Championships results,
- to enable control on eligibility for participation in Championships and International tournaments (for example data on sanctions imposed on Athlete, Coach, Referee, that have certain impact on prerequisite conditions for taking part in Championships and International Tournaments),
- to decide on disciplinary actions.

#### **4. The types of personal data we collect about you**

Personal data are collected in various ways:

- from National federation, when it signs up an Athlete or other individual (a referee, a companion, guest...) on Championship or International tournament (name, surname, gender, date of birth, country);
- directly from individuals in cases of disciplinary actions and imposing sanctions during the Championship or International tournaments (name, surname, gender, citizenship, breach, decision on breach, consequences);
- from Organizer of the Championship or International Tournament (results: name, surname, gender, age group, country, achievement, ranking);
- personal data is collected when National federation interact with ETBF via e-mail accounts. (It is an obligation for each National federation to deliver at least one email address, which ETBF can use for creating mailing lists for contact purposes. Mailing lists are shared among National federations and published at <http://etbf.eu/feds-emails/>).

#### **5. Legal grounds for Processing Personal Data**

The legal ground may be one of the following:

- *Consent*: For example, where an individual has provided his/her consent for communicating e-mail address via National federation to ETBF. One can withdraw his/her consent at any time.
- *Performance of a contract (or in order to take steps prior to entering into a contract with an individual)*: For example, when an Athlete is in breach of the rules from ETBF Constitution which he/she accepted when applying and entering the Championship or International tournament.
- *Compliance with law*: In some cases, ETBF may have a legal obligation to use or keep one's personal data.
- *Legitimate interests*: ETBF keeps publicly accessible Archive of Championships results and analytically and statistically processes the data on the results of individual Championships and International Tournaments to compare achievements by years, National federation and geographical areas, all for the purpose of promoting the development of tenpin bowling.

#### **6. Cookies**

The website of ETBF does not use any cookies.

## **7. Security of your personal data**

ETBF has implemented appropriate technical and organisational controls to protect individual's personal data against unauthorised processing and against accidental loss, damage or destruction.

Access to personal data shall be limited to personnel who needs access and appropriate security should be in place to avoid unauthorised sharing of information. In case ETBF engages a data processor (as KTA Data for now), a written processing agreement will be concluded with it in accordance with the requirements of Article 28 of the GDPR.

## **8. International data transfers**

Data ETBF collects may be transferred to, stored and processed in any country or territory within European Union (EU) and European Economic Area (EEA).

In case of transferring personal data outside EU or EEA, ETBF ensures similar protection and put in place at least one of these safeguards:

- ETBF will only transfer one's personal data to countries that have been found to provide an adequate level of protection for personal data.
- ETBF may also use specific approved contracts that use Standard Contractual Clauses for the protection of personal data where appropriate, with ETBF's service providers that are based in countries outside the EU and EEA.

## **9. Data protection rights with regard to the personal data that ETBF hold about individuals**

Individuals have a number of rights with regard to the personal data that ETBF holds about them and they can contact ETBF with regard to the following rights in relation to their personal data:

- The right to receive a copy of the personal data,
- The right to correct, block or delete the personal data, if it is found that the personal data ETBF is keeping about an individual is incorrect or misleading,
- Where applicable, also a right to receive a machine-readable copy of personal data,
- The right to ask ETBF to delete personal data or restrict how it is used, consistent with the GDPR. There may be exceptions to the right to erasure for specific legal reasons which, if applicable, ETBF will set out for in response to the request,
- Where applicable, the right to object to processing of personal data for certain purposes,

- Where an individual has provided ETBF with consent to use his/her personal data, he/she can withdraw the consent at any time.

One can exercise any of rights specified above via email to Secretary General of ETBF, Nataša Pirc Musar, at [npm@etbf.eu](mailto:npm@etbf.eu) or by post to the President of ETBF Addie Ophelders, Dr. Schaepmanlaan 14, 5463CB Veghel, The Netherlands.

In case of request filed in, ETBF may need to gain additional information from you to help confirm your identity. If request is complicated or if one has made a large number of requests, it may take ETBF longer than one month to respond. When exercising Data protection Rights no payment is requested, however, ETBF may charge a reasonable fee if one's request is clearly unfounded, repetitive or excessive.

### **10. How long ETBF keeps your personal data**

ETBF keeps your personal data for only as long as it needs to, which depends on what ETBF is using it for according to this Data Protection Policy. When the Data is no longer needed, ETBF will delete it or make it anonymous by removing all details that identify an individual. If ETBF have asked for consent to process one's personal data and an individual withdraws his/her permission, ETBF will delete his/her personal data within a reasonable time limit.

### **11. Contact ETBF for information about how we use your personal data**

If you have any questions about how we use your personal data or if you have a concern about how your personal data is used, please contact the Secretary General of ETBF, Nataša Pirc Musar, at [npm@etbf.eu](mailto:npm@etbf.eu).

Complaints will also be dealt with by the Secretary General of ETBF, and will be responded to within 30 days (unless the time limit shall be justifiable prolonged).

If you are not satisfied with the way your concern has been handled, you can refer your complaint to the Dutch Information Commissioner's Office.

### **12. Changes to Data Protection policy**

If ETBF decides to change Data Protection Policy, it will post the changes here. If the changes are significant, ETBF may also choose to email the new details to National federations via contact e-mail addresses.

ETBF, Veghel, May 18, 2021.