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1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

2. Responsibilities

- 2.1 The General Secretary is responsible for ensuring that this notice is made available to data subjects prior to The European Fencing Confederation collecting/processing their personal data.
- 2.2 All Employees/Staff/Volunteers of The European Fencing Confederation who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

3. Privacy notice

3.1 Who are we?

The European Fencing Confederation is the international body charged with the promotion and development of fencing in Europe. It is the continental confederation with the most active members under the authority of the International Fencing Federation (FIE). With over 4000 FIE-licenses — (almost three times more than any other continental confederation) the EFC counts the most active fencers all over the world.

Every year the EFC organizes the European Championships, on senior, U23, junior and cadet levels. Other goals are to promote and develop fencing in Europe, to facilitate technical collaboration between the different members, to coordinate and improve the teaching of fencing in Europe and to represent fencing to European authorities.

The EFC established a number of ground-breaking projects for promoting fencing. The cadet circuit started its success-story here before other confederations tried to catch up To facilitate the change from "junior" to "senior" category the EFC established the U23-European Championship and a U23-circuit.

Our Secretary General can be contacted directly here:

- js@fencing-efc.eu
- +48 22 827 28 25



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The personal data we would like to either collect from or process on you is:

Personal data type:	Source (where The European Fencing			
	Confederation obtained the personal data from			
	if it has not been collected directly from you,			
	the data subject. Note if the personal data has			
	been accessed from publicly accessible			
	sources):			
Your Name	You or your National Governing Body or the FIE			
Your Email Address	You or your National Governing Body or the FIE			
Your Gender	You or your National Governing Body or the FIE			
Your Date of Birth	You or your National Governing Body or the FIE			
The nature of your involvement in fencing	You or your National Governing Body or the FIE			
Your country of residence	You or your National Governing Body or the FIE			
Your nationality	You or your National Governing Body or the FIE			
Your photographic image	You or your National Governing Body or the FIE			

The personal data we collect will be used for the following purposes:

- Registering you with the EFC
- Entering you into competitions organized by the EFC
- Processing records of your involvement in competitions organized by the EFC
- Promoting events organized by the EFC, including the use of any digital imagery for use on media channels;
- Maintaining records of national federations affiliated to the EFC;
- Maintaining records of referees and other officials of the EFC

Our legal basis for processing for the personal data:

- Consent where you have given us your clear consent for us to process your personal data for a specific purpose
- Contract where the processing is necessary for a contract we have with you or because we need to take specific steps before entering into a contract
- Legal obligation where the processing is necessary for us to comply with the law
- Vital interests where the processing is necessary to protect someone's life
- Legitimate interest where the processing is necessary for our legitimate interest or those of a third party



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Any legitimate interests pursued by us, or third parties we use, are as follows:

- To administer the efficient running of fencing tournaments;
- To administer the efficient running of the European Fencing Confederation
- To promote the European Fencing Confederation with other sporting and governmental bodies

The special categories of personal data concerned are:

Health data

3.2 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for The European Fencing Confederation to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

You may withdraw consent at any time by notifying us in writing

3.3 Disclosure

The European Fencing Confederation will not pass on your personal data to third parties without first obtaining your consent.

Third country (non-	Safeguards in place to protect
EU)/international	your personal data
organisation	
Competition organisers	Model Clauses
outside the EEA	
Website providers	Model Clauses
National Governing Bodies	Model Clauses
for Fencing outside the EEA	

3.4 Retention period

The European Fencing Confederation will process personal data for no longer than is reasonably necessary based on the nature of the information processed and the purpose for which it is processed. For example, we will maintain results of competitions (showing a data subject's name and nationality indefinitely for the purpose of historical record but will store any medical data relating to a data subject for no more than 3 years.



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3.5 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access you have the right to request a copy of the information that we hold about you.
- Right of rectification you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing where certain conditions apply to have a right to restrict the processing.
- Right of portability you have the right to have the data we hold about you transferred to another organisation.
- Right to object you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that The European Fencing Confederation refuses
 your request under rights of access, we will provide you with a reason as to why. You
 have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.4 above) in the processing of your personal data.

3.6 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by The European Fencing Confederation (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and The European Fencing Confederation's data protection representatives Data Protection Officer / GDPR Owner.

The details for each of these contacts are:



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	Supervisory authority contact details	[Data Protection Officer (DPO)] / [GDPR Owner] contact details	
Contact Name:	CNPD (National Commission for Data Protection)	Jacek Słupski	
Address line:	Grójecka Street no 65, 02-094	Secretary General Grójecka Street no 65, 02-094 Warsaw, Poland	
Email:	https://cnpd.public.lu/en/support/contact.html	js@fencing-efc.eu	
Telephone:	+48 22 827 28 25	+48 22 827 28 25	

3.7 **Privacy statement**

Read more about how and why we use your data here: https://www.eurofencing.info/efc/privacy.

4. Online privacy statement

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); 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".

How we use your information

This privacy notice tells you how we, The European Fencing Confederation, will collect and use your personal data for organising the activities of the European Fencing Confederation, profiling, complaints, subscriptions etc.



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Why does The European Fencing Confederation need to collect and store personal data?

In order for us to provide you our services we need to collect personal data. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes The European Fencing Confederation would contact you for additional consent.

Will The European Fencing Confederation share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to The European Fencing Confederation in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil any services they provide you on our behalf, such as running competitions or administering our website. When they no longer need your data to fulfil this service, they will dispose of the details in line with The European Fencing Confederation's procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

How will The European Fencing Confederation use the personal data it collects about me?

The European Fencing Confederation will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. The European Fencing Confederation is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

<u>Under what circumstances will The European Fencing Confederation contact me?</u>

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organisation holds about me?

The European Fencing Confederation at your request, can confirm what information we hold about you and how it is processed. If The European Fencing Confederation does hold personal data about you, you can request the following information:



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• Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.

- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of The European Fencing Confederation or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any
 meaningful information about the logic involved, as well as the significance and
 expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

The European Fencing Confederation accepts the following forms of ID when information on your personal data is requested:

- Passport
- Driving Licence
- Birth Certificate



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Contact details of the Data Protection Officer / GDPR Owner:

	Data Protection Officer / GDPR Owner contact details
Contact Name:	Jacek SŁUPSKI
Address line 1:	Secretary General Grójecka Street no 65, 02-094
Address line 2:	Warsaw, Poland
Email:	js@fencing-efc.eu
Telephone:	+48 22 827 28 25

Document Owner and Approval

The Data Protection Officer / GDPR Owner is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

Signature: Jacok Słupski – Secretary General of The EFC Date: November 4, 2018

Change History Record

Issue	Description of Change	Approval	Date of Issue

