



ESC Privacy Policy

Privacy Policy – A few words about the ESC Privacy Policy

The European Shooting Confederation (“ESC”) is committed to protecting your privacy and complying with applicable data protection and privacy law. The ESC Privacy Policy is in line with the principles of General Data Privacy Regulation (GDPR) which was implemented in Europe on 25 May 2018.

The ESC is committed to protect your privacy and personal data and ensure your security when using its website and services.

ESC Privacy Policy („Policy“) is designed to help you to understand what kind of information we collect in connection with our services and how we process and use such information. Throughout this Policy the term „personal data“ means information relating to an identified or identifiable natural person (e.g. name, address, e-mail, phone, photo, etc).

Data responsible

European Shooting Confederation
Voie du Chariot 3, 1003, Lausanne, Switzerland
E-mail: esc@escsport.eu
Website: esc-shooting.org

Secretariat

Luzhnetskaya nab., 8, 119991, Moscow, Russia, off. 336

Why this Privacy Policy exists:

This Privacy Policy ensures ESC:

- Complies with applicable data protection law and follows good practice;
- Protects the right of athletes in shooting sport and members of the ESC community (representatives of the ESC member federations, members of the ESC bodies and other ESC related persons);
- Is open about how the ESC stores and processes individuals’ data; and
- Protects itself from the risks of a data breach.

Which of your data is collected and processed?

The ESC may use your personal data broadly for reasons related to the administration of shooting sport in Europe. If you are a member of the shooting community, this may be done 1) to facilitate your participation in and keep records of activities and meetings; 2) to keep records of competitions, development activities and meetings; 3) to promote shooting sport; and 4) to safeguard the integrity of shooting sport in Europe.

To administer your participation in the shooting sport, the following data is required:

Athletes Data: a) information about you as an Athlete (in particular first name, last name, gender, date of birth, nationality, membership with federation, your ID in the ISSF databases) and b) information about competitions you participate in (in particular the date, name and venue of competitions, your personal results, records, rankings, and similar;

Personal data of athletes who will enter for participation in the European Championships or other competitions acknowledged or supervised by the ESC may only be used from the ISSF database from which personal data of athletes are sent to the organizer of the competition. The ESC has not control over the ISSF's processing of athletes data.

Officials Data: information about you as a member of the ESC body or committee (in particular: first name, last name, address, e-mail, year of birth)

Sports-related information: information about you as a representative of the national shooting federation – member of the ESC, records of sport performance, ranking records, disciplinary/grievance information, attendance at competitions

Media-related information: for example, photos or videos taken at the ISSF or the ESC-supervised competitions, other competitions in shooting sport (e.g. multisports competitions), meetings or other activities in relation with shooting sport);

In addition to the above, if you are an athlete, we may collect and process the following personal data, which is considered more sensitive as **anti-doping related data**.

Data obtained through the registering forms on the ESC web site sent from national federations for special purpose, from the ISSF databases and from different reports or results lists from the ESC, the ISSF or other (multisports) competitions.

In general, the ESC considers that personal data must be collected and used fairly, stored safely and not disclosed unlawfully. In particular, the ESC endeavours to follow seven principles. These say that personal data must:

- Be processed fairly and lawfully.
- Be obtained only for specific, lawful purposes.
- Be adequate, relevant and not excessive.
- Be accurate and kept up to date.
- Not be held for any longer than necessary.
- Be processed in accordance with the rights of data subjects.
- Be protected in appropriate ways.

Legal basis for the processing of data

The legal basis for use of data by the ESC are **legitimate interests** pursued by the ESC according to Article 6 (1) (f) GDPR. The processing of data is entirely necessary for the ESC to comply with their statutory obligations. The ESC is an independent legal entity and one of the Continental Federations that comprise the International Sport Shooting Federation („ISSF“). The ESC aims at the continued development and promotion of shooting sport and is not profit-oriented. The processing of personal data as described in this Policy is therefore a sine qua non and thus compulsory condition to fulfill the said statutory mission and is thus inherent to the ESC's existence.

Another legal basis may be the contractual relationship of the ESC with the national shooting federations of which you are a member according to Art 6 (1) (b) GDPR. When these federations accept to organize competitions with the ESC, they need to accept certain terms and conditions, including an obligation to inform you of this Privacy Policy and obtain your consent, to the extent necessary.

The legal basis for use of data for archiving purposes and statistical purposes is Article 5 (1) (b) GDPR in connection with Article 89 (1) GDPR.

Access to data and purposes of data use

The ESC database is not public and is used to administer and organise the ESC competitions and other activities. Any access to the database is password administered. The data are accessible only to a limited number of the ESC staff and officials of the relevant competition. The ESC will process your personal data for the following purposes:

- the organisation of the ESC shooting competitions, meetings and other activities,
- the compiling and publication, presentation, promotion and marketing of results in connection with the participation in sports events,
- processing of the data for archiving and statistical purposes.

The ESC do not intend to process personal data for the purposes of automated profiling within the meaning of Article 4 (4) GDPR.

Information on the transfer of personal data

If you are a member of the shooting sport community, the ESC may share your personal data with relevant member federations, competition organizers including multisport games organisers or local hosts, in order to facilitate your general participation in competitions or activities.

Biographical data about athletes and officials may also be published on the ESC website, for documentation of the sport and its governance.

If you come under Anti-Doping Regulations as an athlete the ESC can share your Personal Data and/or your anti-doping related information with WADA, your National Anti-Doping Agency, or organisers of the ESC competitions or multi-sport games, for purposes strictly related to anti-doping.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the ESC legitimate interests in compliance with applicable laws.

Personal data will also be shared with third party service providers, who will process it on behalf of the ESC for the purposes identified above /e.g. the ESC ranking list/. In particular, the ESC may use third party providers of IT services, TV production services, promotional advice, competition organisation, data analytics, and legal and accounting services.

The ESC does not sell, rent, or lease any individual personal Data to anyone for marketing purposes, and will take commercially reasonable steps to maintain the security of this information.

Your information is processed in Switzerland, and may be processed elsewhere depending on the location of affiliates, sports partners, and other entities who are permitted to access such information under the terms of this Privacy Policy (and such locations outside the European Economic area) may include countries which may not afford the same level of protection of such data as the country from which you provided the information). If the ESC has to process your information outside the European Economic area, the ESC will take all reasonable steps to ensure that your information is treated as safely and securely as it would be within Switzerland and under the Swiss Data Protection Act, as amended from time to time („DPA“) and the GDPR including: putting into place data protection agreements such as the EU model clauses. By accessing or using the ESC digital platforms or submitting personal information to the ESC, you specifically agree to that transfer and related purposes.

Security

The ESC wants you to feel confident about using the ESC Digital Platforms. For that reason, the ESC implemented reasonable technical and organisational measures designed to secure your information from accidental loss and from unauthorised access, use, alteration or disclosure. However, the internet is an open system and the ESC cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your information for improper purposes.

If you communicate with ESC by email, you should note that the secrecy of internet email is uncertain. By sending sensitive or confidential email messages or information which are not encrypted, you accept the risk of such uncertainty and possible lack of confidentiality over the internet.

Your rights as data subject

According to Article 15 GDPR, you have a right to obtain information, which and how personal data related to you are being processed by the ESC („**Right of access**“). According to Article 16 GDPR, you have the right to request that inaccurate or incomplete personal data related to you be corrected or deleted („**Right to rectification**“). Article 17 GDPR entitles you to request the erasure of your personal data when and to the extent that the purpose of data processing has lapsed or ceased to be applicable for other reasons („**Right to erasure**“). According to Article 18 GDPR, you may request the restriction of processing of your personal data in specific situations, for instance when you have contested the accuracy or lawfulness of the processing of data („**Right to restriction**“). Finally, according to Article 20 GDPR you have a right to data portability of personal data, which you have provided to us („**Right to portability**“). You may object, under the conditions foreseen in Article 21 GDPR, to the further processing of your personal data, in particular if you believe to have a legitimate interest to object even though but not limited to a situation where you believe that your particular situation requires that the ESC no longer process your personal data even though its use is based on the legitimate interest of the ESC („**Right to object**“).

You may, at any time, object to the processing of your personal data for direct marketing purposes to the extent that it is related to direct marketing, free of charge. To exercise your rights, you can send a request by email or by regular mail along with a proof of identity (copy of official Identification Document with a photo mentioning your birth date and place of birth), and your contact details (phone number and email), to ESC official e-mail: esc@escsport.eu

Where the processing of your data is based on your consent, you have the right to withdraw consent at any time by informing: esc@escsport.eu. This, however, does not effect the lawfulness of processing based on your consent before the withdrawal.

Requests are free of charge unless requests are manifestly unfounded or excessive. In such cases, the ESC may charge you a reasonable request fee according to applicable data protection legislation. The ESC may refuse, restrict or defer the provision of information where the ESC has the right to do so under current data protection legislation. Finally, the ESC inform you that you have the possibility to lodge a complaint with the Swis Federal Data Protection and Information Commissioner („FDPIC“) or the competent Information Commissioner in the EU (where applicable). Please note that in certain circumstances the ESC may withhold access to your information where the ESC has the right to do so under current protection legislation.

Jurisdiction and applicable law

This Privacy Policy and all matters arising out of or related to this Privacy Policy shall be governed by the substantive laws of Switzerland, without regard to conflicts of laws and principles thereof.

Changes to this Privacy Policy

Amendments to this Privacy Policy in order to always comply with current legislation and updated organisational needs, the ESC reserves the right to amend this Privacy Policy as necessary and appropriate. You can view the latest version of the Privacy Policy on the ESC website at: <http://esc-shooting.org/documents/official/>.