

# Privacy statement Stichting De Veluweloop

## 1. General

The General Data Protection Regulation (GDPR) came into effect on 25 May 2018. The GDPR has a number of goals: transparency, purpose limitation, data limitation, correctness, retention limitation, accountability, integrity and confidentiality. This privacy statement explains how Stichting De Veluweloop deals with this.

Stichting De Veluweloop is an organizer of running competitions in which also youth participate; this obliges us to be extra careful with personal data. The GDPR indicates that for persons under 16 years of age, permission from a parent or guardian is required for the use of personal data.

The participants in the running races (De Veluweloop) are registered by their team leader. The team leader is expected to share this privacy statement with the members of the team. In the case of participants under the age of 16, the team manager is expected to share these privacy regulations with the parent (s) or guardian of the relevant participant.

Stichting De Veluweloop expects the team leader, participants and volunteers to be aware of the content of this privacy statement, to accept it and to comply with it. The team leaders are informed of these privacy regulations when enrolling online and registering for the event on the day itself. The volunteers are referred to these privacy regulations when registering as a volunteer and when registering on the day of the relay race.

As a small organization, Stichting De Veluweloop does not have a “data protection officer”. If there are questions or concerns about personal data, you can contact the secretary or the chairman of Stichting De Veluweloop via [veluweloop@veluweloop.nl](mailto:veluweloop@veluweloop.nl).

Stichting De Veluweloop adjusts its privacy policy from time to time to keep it up-to-date. The website will always contain the most recent version of the Privacy Statement. Stichting De Veluweloop therefore advises participants to consult the Privacy Statement. In the event of important changes, Stichting De Veluweloop will inform the team leaders by email.

## 2. What personal data is saved and why?

Below is a list of the data we store and the main functions for which that data is used.

- First name, last name, initials, gender, email address and telephone number of the team leaders. First name, last name, initials and gender of the individual participants are registered. These are necessary to inform the team leader about the event and to be able to organize the running event.
  - In this regard, due to the Covid-19 virus present in 2021, the data regarding contact information of team leaders are stored and used for contact if needed regarding an Covid-19 incident. If a participant in the race had contracted or fallen ill due to Covid-19, within 10 days of the event (19<sup>th</sup> of October), the organisation committee will contact all team leaders that participated in the same time slot as the participant in question.
- Additional information may be requested for participation in the VeluweLoop and related events (e.g. bank account number for direct debit with orders or participation in a meal). This data will not be included in the administration and will be deleted after the event has ended and upon administrative completion after the event.
- First name, last name, initials, email address, date of birth and telephone number of volunteers who support the VeluweLoop.
- Results of the relay race (see chapter 4).
- Photo albums (see chapter 5)

Participants expect Stichting De VeluweLoop to keep a historical archive. Therefore, photo albums (online) and participant lists (offline) are kept and not deleted. Results of competitions that we organize (see chapter 4) are not removed, because participants appreciate being able to find a performance from, for example, 10 years ago. Other data will be deleted no later than 2 years after the (end) date.

Stichting De VeluweLoop sends e-mails to team leaders, among other things to inform them about Stichting De VeluweLoop and to invite them to competitions. Team leaders can unsubscribe from this newsletter. Every participant / team leader / volunteer and former participant/former team leader/former volunteer has the right to request access and to request a copy of his personal data. To prevent abuse (e.g. by stalkers), a formal procedure is used for this. Participants, team leaders and volunteers can invoke the “right to be forgotten”, insofar as this is not in conflict with this Privacy Statement.

Team leaders take care of the registration of teams and their participants in the VeluweLoop. Participants who are registered for the VeluweLoop via the team leaders agree that Stichting De VeluweLoop uses the necessary personal data from the administration to arrange the registration and agree to the registration conditions of the VeluweLoop. Personal data will only be passed on to other organizations if this is necessary for the functioning of Stichting De VeluweLoop. This concerns the cases below: The printer of the program booklet receives the current address details of a limited number of volunteers who must be available at the time of the running race.

See also chapter 6. (Data processors).

- The computers on which the De VeluweLoop systems run, are equipped with proper security measures (e.g. anti-virus software).
- In the unlikely event that a data breach does occur, the victims will be notified as soon as possible. The GDPR obliges us to document all data breaches.

## 3. Website

The website of Stichting De VeluweLoop does not contain trackers, analytical cookies or third party cookies. The public part of the website may contain contact details (telephone number, email address) of a limited number of board members and committee members. This only after permission from the board members and committee members.

## 4. Publishing of results

Results (race date, team name, results) of our competitions will be published on the public section of our website or on other public websites (e.g. other running related websites).

Newsworthy results (date of the match, name of team/participant, result) can also be published elsewhere without first requesting permission from the athlete concerned, for example as a news article on their own website, on other websites, social media and/or door-to-door magazines. The aim is to promote the Stichting De Veluweloop. NB. Different rules apply to photos and other images. See chapter 5.

If you (or your minor child) have a stage record, your name (or your child's) and achievement will be posted on the public section of the website. The stage record will remain there until the record is broken.

## **5. Publishing of imagery**

Making photos, videos and other visual material public, in which team leaders and participants in competitions are recognizable, requires special attention. Visual material in which a person is clearly recognizable in the image is seen by the GDPR as personal data. The invasion of privacy and the dangers of possible abuse are greater when photos are published than when only names and performances are published. However, participants in our competitions expect competition photos to be taken and published.

Stichting De Veluweloop also has a legitimate interest in making imagery public on a limited scale. For the continuity of Stichting De Veluweloop it is necessary to actively recruit new team leaders, participants and volunteers for competitions. The use of appealing visual material is important in this respect, for example with articles that are sent to the local press on behalf of Stichting De Veluweloop. Current events are important: if there is a competition in the afternoon, then a report is expected on the website in the evening and an article in the newspaper (or another news medium) the next day. That makes it difficult to request permission to use images.

That is why we publish images without the specific permission of the persons portrayed. In doing so, we weigh the legitimate interest of the Stichting De Veluweloop against the privacy interests of the people portrayed and the risks of the media used. And of course we respect other legislation, such as copyright and portrait rights. Based on these considerations, Stichting De Veluweloop uses the following procedures when publishing visual material:

By participating in the Veluweloop and/or related public contests and events, participants authorize the organization to take photos and other visual material, and to make it publicly available, unless participants explicitly indicate that no visual material may be made and published. At public competitions and events, participants expect that images made will be made available. Therefore, images of public events and competitions can be made available through photo albums etc. on the public part of the Veluweloop website. Depicted persons can object to specific images.

For the public part of our own website, for our own club magazine and for publications on social media, in newspapers and door-to-door magazines, we therefore use newsworthy images without asking permission from the people portrayed and without informing these persons.

## **6. Data processors**

Stichting De Veluweloop has the following data processors:

- The printer of the program booklet
- Hosting provider of the website

These are all Dutch companies and we are working to compose AVG agreements with these data processors, to ensure that also these organizations treat our data with respect.

Wageningen, 7th of May, 2021