

DATA PROTECTION: PRIVACY NOTICE (FOR ATHLETES)

Section 1: Introduction

The English Institute of Sport Limited ("the EIS", or "we") is a private limited company registered in England and Wales with company number 4420052, having its registered office at The Manchester Institute of Health & Performance, 299 Alan Turing Way, Manchester M11 3BS.

The EIS provides sport science, medical and technology services (otherwise referred to in this notice as 'services') to athletes on a World Class Programme (WCP) or on a Pathways/Talent programme.

The EIS respects your privacy and is committed to protecting your personal data. The official purposes for which the EIS processes personal data are notified to the Information Commissioner's Office (the ICO). To view these details, simply enter the EIS's Registration Number (Z7755332) into the ICO's public register search form [here](#).

Section 2: Who does this privacy notice apply to?

This privacy notice applies to all athletes to whom the EIS provides services (also referred to as 'you') to ensure you know how your personal data will be processed, the third parties to whom it may be passed, the other data controllers with whom your data is shared and how long EIS will hold on to your data. It also explains your rights and responsibilities in respect of the data and how you can opt out of some aspects of the processing, where applicable.

The reference to "processing" your personal data, means the EIS may collect, record, store, disclose, share, delete or otherwise use your personal data to provide effective services and as agreed under contract with your sport's national governing body ("NGB"). The EIS may determine its own purposes and means of the processing of your personal data or it may do so jointly with your NGB.

The EIS is a "data controller" and responsible for ensuring its processing of your data complies with applicable Data Protection Legislation.

The types of personal data the EIS collect and use

The type of personal data processed will vary depending on the services(s) received, and/or transaction involved. Further details are provided in the Appendices to this Notice.

Section 3: What is the source of your personal data?

The personal data processed by the EIS is initially collected from direct interactions with you such as the details you provide to us, as well as details provided by your NGB and UK Sport, when you first commence your programme. Subsequent data will be added during your interactions with us either directly from you or by the EIS staff working with you or other third parties instructed by the EIS (all as further detailed in this notice in the appendices below).

Section 4: Lawful bases for processing

Every instance of "processing" of personal data under the General Data Protection Regulation 2016 ('the GDPR') requires a 'lawful basis'.

The lawful basis on which the EIS is able to carry out the processing of your data will depend on the circumstances of the processing but will fall under at least one of the following lawful bases set out in Article 6, GDPR.

Article 6(a) Consent – you give your clear and informed consent for the EIS to process your personal data through your signing of the Athlete Consent Form. If, in the future, the EIS processes your data for any new purpose then your consent for the new purpose will be obtained at the time.

Article 6(c) Legal obligation – under regulations set by the Care Quality Commission, (in particular Regulation 17 of the Health and Social Care Act 2008), the EIS are required to maintain good governance, which includes maintaining accurate, complete and detailed records in respect of each person using its services.

Article 6(d) Vital interests – as explained in section 6 below, there may be limited circumstances where the EIS would need to process your data in order to protect your vital interests, without your consent. This basis would only be relied upon where your consent could not reasonably be obtained.

Article 6(f) Legitimate interests – the EIS may carry out processing that is necessary and in the EIS' legitimate interests, but only where the processing could not be achieved under another basis outlined above, for example, where there is a clear benefit to you or others (not outweighed by your rights), and the processing can be reasonably expected, such as for reasons of good governance, accounting and managing or auditing business operations, including processing a payment, or answering an enquiry using your details.

Where special category personal data is being processed

Where the EIS processes your health or medical data (which is defined as "special category" personal data under the GDPR), it will require another basis for processing under Article 9 of the GDPR, in addition to one of the bases given above, as follows:

Article 9(2)(a) Explicit consent - where you have given 'explicit consent' to the processing of personal data for one or more specified purpose, such as the explicit consent you provide to receive services from the EIS, which is obtained by asking you to read and accept the terms of this privacy notice. It will also be relevant where we ask you to take part in a survey or study, and you provide explicit consent to do this.

Article 9(2)(h) Health services – this will be relied upon where the processing is necessary for the purposes of preventive or occupational medicine, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services, and may cover an array of treatment and/or administrative scenarios/ decisions, if the processing is necessary for these purposes, in view of the fact the EIS is a healthcare provider.

Article 9(2)(j) Archiving purposes in the public interest, scientific or historical research purposes – this will be relied upon where such processing is necessary, proportionate to the aim pursued, and only where specific measures are in place to safeguard the fundamental rights and the interests of the data subject. This will cover where the EIS is processing personal data for innovation and/or research reasons, in order to improve the services that the EIS provide in the field of high-performance sports science and medicine but will not cover direct (participant) research purposes, in which case you will be asked to provide explicit consent for. In addition, where processing your personal data for such purposes, EIS will always take steps to reduce the amount of identifiable information involved.

It should be clear from the above that while we will in the main seek explicit consent to process your personal data for the purposes outlined in this notice, consent may not be the only legal basis on which we will process your personal data.

Section 5: EIS Services

The type of personal data processed by the EIS and the purposes for which it is processed within the EIS will vary depending on your programme and the services you receive from the EIS, and include the following:

Section 5A: Talent / Pathways Services

If you are a member of a 'Talent' team, a Performance Pathways athlete (any age) or any other athlete that falls outside of the WCP, you will not receive the full programme of services listed in this notice for the WCP athletes. For example, you might receive a combination of EIS services from Physiotherapy and Nutrition, and some limited S&C oversight, but not all the disciplines listed for the WCP athletes. Your data will be held on a secure medical records database developed by the EIS to hold sensitive data, a secure sharing platform or on the EIS practitioner's encrypted laptop, however only the EIS practitioners working with your NGB's talent athletes, would be able to access your personal data. The EIS would suggest if you are in any doubt as to what services are provided to you, as a talent or pathways athlete, to check with your contact in the sport, and refer to the corresponding headings below.

Performance Pathways (Performance Foundation / Talent Identification) is a centralised strategic support services managed by UK Sport (UKS) and supported by the EIS. Its staff members sit across both UKS and the EIS. Those staff members will have access to the data, and the data will therefore be shared within the team, or with other EIS or UKS teams to the extent required to support the Performance Pathways programme. Any data processed by the performance pathway team will be processed in accordance with the [UKS Data Protection Protocol](#).

Section 5B: World Class Programme Services

Athletes on the world class programme may receive services from some or all of the EIS disciplines noted below and further described in the table in Appendix A to this notice. Such services will be delivered by the EIS employees or suitably skilled and experienced contractors working under strict contract terms of confidentiality on behalf of the EIS:

- Medical services, including access to EIS doctors
- Physiotherapy
- Strength & Conditioning
- Physiology
- Psychology
- Performance Lifestyle
- Biomechanics
- Performance Analysis
- Performance Nutrition
- Performance Innovation

In addition, the EIS may process athlete data to provide services to your NGB, these services ensure continual improvement in the provision of leading sport science, medicine and technology to UK elite athletes:

- Athlete Health
- Sport Intelligence
- Research

The EIS may contact you by email in order to provide you with the relevant services, this may include emails requesting that you complete a survey, but only where deemed necessary for the vital delivery and future improvement of services. The EIS would never contact you, or allow a third party to contact you, for direct marketing purposes unless you have provided consent for us to do so.

It should be noted that all EIS employees and contractors are bound by strict obligations of confidentiality under their employment contract or contractor agreement. In addition, membership of their relevant professional body, such as our doctor's membership of the GMC, requires our employees to be responsible for the confidentiality of all athlete's records. The data will only be shared within EIS, with other data controllers and with third parties all as set out in this notice and for the purposes specified, but you may at any time request that your records are restricted to specific named individuals. You must understand that such restrictions may have an effect on EIS's ability to provide services to you and we would reserve the right to withdraw the provision of any services. This would be explained to you should you make the request.

Section 6: Sharing your personal data (WCP Athletes)

The EIS may disclose personal data, including special categories of personal data, to EIS colleagues in other disciplines, or to third parties (such as your NGB) while you are on the world class programme, where necessary and where there is a clear lawful basis. The EIS is responsible for ensuring that any such transfer of (including the security of) this data complies with applicable Data Protection legislation.

Sharing Data Within the EIS

EIS practitioners will often work within multi-disciplinary teams across the EIS, with the aim of ensuring that all their work is aligned to optimising the determinants required for you to win in your sport or event. For example, details of physiotherapy rehabilitation plans may also be shared with EIS S&C practitioners as this is necessary for those S&C practitioners to safely provide you with their services. The data may also be shared with more senior staff and occasionally with external experts, for the purposes of audit and quality assurance.

EIS Doctors, physiotherapists, nutritionists, psychologists and soft tissue therapists use a secure system developed for EIS, called PDMS (Performance Data Management System) to record, view, access and update medical and health data. PDMS is also used to share data across the multi-disciplinary teams but access to specific data is restricted to those with a specific purpose to access that data, for example medical records can only be accessed by medical personnel (the only exceptions being where you have consented otherwise or for administration or system development purposes).

Data on PDMS may also be viewed, accessed and updated by your NGB medical personnel. Your NGB will have obtained your consent for this access.

You may however request that certain medical data is restricted to "doctors only", "named practitioners only", or "my eyes only" (the latter restricting access to the practitioner whom inputted the information) Unless you make a request not to have this,

an overall 'Medical Availability Status' – in the form of a red, amber, yellow, green status - will be available to medical and non-medical staff of the EIS and the NGB who have access to your data on PDMS.

PDMS is managed by a team of EIS administrators who control access. All users must accept the PDMS "Terms of Use". It also has a number of in-built security features. You can access PDMS via an online application, once you have been issued with log in details. The EIS administrators will also have access to your data in order to provide reports and EIS's external software developers will also have access in order to manage and develop the PDMS system generally.

Where applicable, the data held on PDMS may be accessed by the administrator of the medical insurance policy which has been put in place for you as an athlete on the WCP.

Where EIS practitioners do not use PDMS for data capture, the data will be kept on individual practitioner's encrypted laptop or encrypted external hard drive or other secure IT system managed by the EIS or a third party, under strict contract terms.

Sharing Data with Other Parties

The EIS will share your personal data with other data controllers, including other data controllers with whom it acts jointly such as your NGB. For example, data sharing will occur within EIS multi-disciplinary teams who work proactively to ensure that an athlete's coach and NGB have knowledge of relevant data collated about the athlete. The EIS may also seek expert specialist advice from third parties such as research institutions or medical experts. All data is shared under strict contract terms concerning confidentiality and may be withheld from a third party according to your instructions.

Other than for athletes under 18 years of age, vulnerable adults or those who lack legal capacity and except in the most exceptional of circumstances, the EIS will not disclose an athlete's personal data to parents, guardians or any other relative. If you have provided a nominated contact in the event of a medical problem or emergency then relevant personal data may need to be provided accordingly.

Further details of the third parties we share data with are set out in **Appendix B** to this notice. The NGBs and other bodies which receive services from the EIS can be viewed in **Appendix D**. Your data will only be shared in an amount that is required ie. we work to the principle of 'data minimisation'.

Section 7: Back-office functions

The back-office functions of the EIS will require access to athlete personal data in order to support the delivery of EIS services, which is further detailed in **Appendix C**.

Section 8: How long will we retain your personal data for, once you no longer receive services from the EIS?

The EIS will retain your full athlete medical records, which will include all information about the services received as an athlete on programme, for 25 years from the date of last intervention.

Where possible and where information is considered valuable for future use, steps will be taken to have such data pseudonymised (ie. the personal data will be held in such a way that the data can no longer be attributed to a specific data subject without the use of additional information).

The reasons for retaining athlete medical records/ information for a period of 25 years is due to the extreme nature of training that an athlete will endure during sporting life. This retention period allows the EIS to track back over a long period of time to establish any long-term health consequences (both physical and mental) of high intensity training in Olympic and Paralympic athletes which may arise and would otherwise be lost.

Section 9: Your rights and contact details

You have certain rights and responsibilities around your personal data including:

Rights	What does this mean?
1. Right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data and your rights. This is why we're providing you with the information in this Privacy Notice.
2. Right of access	You have the right to obtain access to your personal data (if we're processing it) and certain other information (similar to that provided in this Privacy Notice). This is so you're aware and can check that we're using your personal data in accordance with data protection law.
3. Right to rectification	You are entitled to have your personal data corrected if it's inaccurate or incomplete.
4. Right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your personal data where there's no compelling reason for us to keep it. This is not an absolute right to erasure; there are exceptions.
5. Right to restrict processing	You have rights to 'block' or suppress further use of your personal data in certain circumstances. When processing is restricted, we can still store your personal data, but may not use it further.
6. Right to data portability	You have the right to obtain and reuse your personal data in a structured, commonly used and machine readable format in certain circumstances. In addition, where certain conditions apply, you have the right to have such information transferred directly to a third party.
7. Right to object to processing	You have the right to object to certain types of processing, in certain circumstances. In particular, the right to object to the processing of your personal data based on our legitimate interests or on public interest grounds; the right to object to processing for direct marketing purposes (including profiling); the right to object to the use of your personal data for scientific or historical research purposes or statistical purposes in certain circumstances.
8. Right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

Right to complain	If you're not satisfied with our response to any complaint or believe the EIS' processing of your personal data does not comply with data protection legislation, you have the right to lodge a complaint with the UK Supervisory Authority, the Information Commissioner's Office (ICO), who can be contacted using the following details: Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF Telephone number: 0303 123 1113 Website: www.ico.org.uk
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You have the right to exercise any of the rights described above at any time, including the right to request access to copies of your personal data. Should you wish to do this, please notify us in writing at dataprotection@eis2win.co.uk.

On receipt of your request, the EIS will confirm the steps it will take to comply with your request or will explain if there is an applicable exception to the right, which means that the EIS cannot comply with the request. Any such request will be processed within the statutory time limits for responding.

Section 10: How can you contact us?

If you have any questions about this Privacy Notice, or if you wish to make a request in respect of any of your rights, please contact the EIS' Data Protection Officer ('DPO'), using the above details. Details on how to make a complaint to the UK's Supervisory Authority are also set out in the table directly above.

Data Protection Officer (DPO): The EIS' nominated DPO is Helen Hughes and she can be contacted in the following ways:

By Post: Manchester Institute of Health & Performance, 299 Alan Turing Way, Manchester M11 3BS.

By Email: dataprotection@eis2win.co.uk

Section 11: Your responsibilities

Athletes have an individual responsibility to ensure that all personal information provided to the EIS is accurate and kept up to date. You should notify any changes of address, corrections to contact details etc. to the PDMS admin team at pdms.admin@eis2win.co.uk or your usual EIS contact.

Section 12: What happens if the EIS decide to change this Privacy Notice?

We keep our privacy notice under regular review to make sure it is up to date and accurate. Following review, we will:

- Update all relevant documentation (including the notice stored on PDMS and on the EIS website) for any minor changes; and
- Notify all active athletes by email of any material changes.

Version: 3.0

Date: 1 October 2019

APPENDIX A
DATA PROCESSING BY EIS DISCIPLINES AND EIS SERVICES

EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
DOCTORS	Medical records	<p>EIS doctors provide medical care for injuries and illness to athletes.</p> <p>Solutions require accurate diagnoses, careful clinical examination and experience and knowledge of sport specific movement patterns.</p> <p>Sports medicine impacts performance in numerous ways because it enhances athletic performance, assists the development of training programme, supports injury prevention and management and of course identifies and treats any underlying conditions that may be impairing sports performance.</p>	<p>All doctors licensed to practice in the UK do so under the regulations of the General Medical Council (GMC). The GMC holds doctors responsible to protect the confidentiality of patients' records and this includes athletes in the EIS.</p> <p>Your EIS doctor and CMO of your sport will adhere strictly to the guidance of the GMC and will discuss with you, whenever appropriate, should medical information need to be shared on you with others inside or outside sport.</p>
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Physiotherapy and Soft Tissue Therapists	Physiotherapy assessment and treatment records <ul style="list-style-type: none"> ○ Consent forms for specific treatment techniques (e.g. cervical manipulation, 	The challenge of maintaining athlete health in the context of intense physical, physiological and psychological stress is a	Physiotherapists have a professional and legal obligation to keep an accurate record of their interaction with

	<ul style="list-style-type: none"> acupuncture) o Physiotherapy screening information o Injury prevention exercise regimes o Rehabilitation plans / programmes o Individual athlete performance plans o Letters from medical consultants o Email communications o Insurance disclaimer paperwork required for team travel to North America o Classification portfolios (for Paralympic athletes) o Photos / video footage o Injury, Illness, wellbeing and training data 	<p>critical determinant in elite sport. Highly trained physiotherapists at the EIS are embedded within the performance environment, working closely with athletes and coaches to minimise the threat of sustaining injury and optimise athlete recovery.</p> <p>Soft tissue therapists utilise a range of treatment modalities and is frequently used as a complementary modality within the wider training and competition recovery strategy under the guidance of the physiotherapy team to influence tissue mobility. Working collaboratively in the performance team, soft tissue therapists help minimise the amount of time lost to injuries and maximise the availability of athletes to train and compete.</p>	<p>their patients (athletes). It is therefore essential that all physiotherapy interventions and treatments must be recorded accurately and with sufficient detail to satisfy legal requirements</p> <p>Where applicable, you may be entitled to physiotherapy services for a limited period of time following your departure from the World Class Programme (this will normally be up to 3 months) and your data will continue to be processed by EIS during this period.</p>
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Strength & Conditioning	<ul style="list-style-type: none"> o Testing, assessment and monitoring data o Training programmes including performance, injury prevention and rehabilitation o Training exposure data including load monitoring o Annual and quadrennial overview plans o Individual athlete performance plans 	The role of the strength and conditioning team is to use exercise prescription specifically to improve performance in athletic competition. They also help athletes with injury prevention and proper mechanics within	All S&C interventions and programmes must be recorded accurately and with sufficient detail to satisfy the Home Country Sports Institute Code of Conduct around record keeping

	<ul style="list-style-type: none"> ○ Email communications ○ Meeting and athlete review notes ○ Athlete, squad and sport reports of training ○ Competition and race day preparation strategies ○ Travel, camp and competition schedules, plans and strategies ○ Normative squad and sport data ○ Photos and video footage ○ Anthropometric data including body mass ○ Athlete injury and illness status including long standing conditions such as diabetes etc ○ Gym inductions and access documentation 	<p>their sports performances</p> <p>Strength and Conditioning encompasses the entire development of the athlete and what is needed to improve physical performance. This includes plyometrics, speed and agility, endurance and core stability with strength training being just one piece of the jigsaw.</p> <p>Once the specific strength qualities have been identified, they are measured and tracked to ensure that the strength and conditioning programme is being effective and achieving its goals.</p>	
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Physiology	<ul style="list-style-type: none"> ▪ Physiological profiles ▪ Training data • Programming & prescription • Monitoring ▪ Performance data ▪ Haematology & biochemistry ▪ Consent forms, including health and well-being • Medication • Menstrual cycle 	<p>An EIS sports physiologist seeks to understand the physiological demands of a sporting performance, which inform what characteristics an athlete should have to be successful competing at the highest level. The physiologist can measure how an athlete performs in tests designed to accurately measure these characteristics, which in turn enables the EIS practitioner to</p>	

		<p>advise coaches and athletes about training and competition, with objectivity and individuality.</p> <p>Physiologists understand how the body responds and adapts to performing in different environments such as high heat or altitude. In a sporting context, this is important for informing preparation to compete in environmental extremes, or as a performance enhancing training stimulus.</p>	
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Psychology (Sport and Performance)	<ul style="list-style-type: none"> ○ Sport psychology assessment records including personality profiles (e.g., Insights) ○ Consent forms ○ Intervention plans / Programmes ○ Individual athlete performance plans ○ Travel, camp and competition schedules, plans and strategies ○ Competition and race day preparation strategies ○ Email communications ○ Photos / video footage ○ Wellbeing data ○ Performance Psychologists may also be given visibility of notes relating to athlete injuries and illnesses in order to inform service delivery to that athlete, but only where shared by a medical 	<p>The aim of an EIS Psychologist is predominantly to help athletes prepare psychologically for the demands of competition and training.</p> <p>Supporting a positive mindset during training allows elite athletes to focus on making the small improvements that will give them a higher probability of winning when it comes to competition.</p>	<p>It is essential that all psychology interventions and treatments must be recorded accurately and with sufficient detail to satisfy legal requirements.</p> <p>Psychologists have a professional and legal obligation to keep an accurate record of their interaction with their patients (athletes)</p>

	practitioner working with the athlete - medical records will by default not be shared with Performance Psychologists.		
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Performance Lifestyle	<p>Support is provided by EIS performance lifestyle practitioners at your request. They will process any personal data that you provide during the period of support. Such data could include sensitive data such as health, sexual orientation or criminal convictions.</p> <p>This data is restricted to the EIS practitioner who is supporting you and will not be shared with any other party other than a replacement practitioner or where you have explicitly consented to such sharing.</p>	<p>Performance Lifestyle is a coaching and mentoring service that seeks to develop athletes personally and professionally whilst accelerating their ability to create and manage a lifestyle that supports and prioritises performance.</p> <p>EIS performance lifestyle practitioners provide support to athletes by working to develop the necessary skills needed to cope with the unique demands of being an elite performer. They also help athletes prepare for life after sport and develop links with employers to provide career development opportunities designed to fit around training and competition demands.</p>	You will be offered Performance Lifestyle support for a period of time following your departure from the World Class Programme and your data will continue to be processed by EIS during this period.

	<p>information relating to movement patterns, timing information and forces</p>	<p>platforms, inertial measurement systems, speed guns, electromyography and pressure distribution systems. Traditionally assessments have been laboratory based, however the development of technology now enables detailed field based and competition capture.</p> <p>Quantifying and understanding movement can help to diagnose problems which might limit sporting potential or risk long term injury. With close athlete and coach consultation, movement technique and sporting equipment may be altered to modify movement patterns with significant impact on an athletes' performance.</p>	
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Performance Analysis	<p>Performance analysis is primarily delivered through the provision of objective statistical (Data Analysis) and visual feedback (Video analysis).</p> <p><u>Video and photos</u></p> <ul style="list-style-type: none"> ○ Competition performances from local, national and international competitions ○ Training performances ○ Movement assessments / physical profiling (in conjunction with other 	<p>Performance analysis is a specialist discipline involving systematic observations to enhance performance and improve decision making.</p> <p>Broadly speaking, the purpose of processing data is to provide objective intelligence to inform and enhance performance and improve decision making. This purpose may be applicable at</p>	

	<p>relevant practitioners)</p> <p>These videos and photos can be captured from a variety of private (e.g. EIS practitioners filming) and public sources (youtube, directly from broadcasters etc.)</p> <p><u>Numerical data</u></p> <ul style="list-style-type: none"> ○ Athlete biographical information (age, DOB, height, weight, sport-specific information such as classification, impairment type) ○ Athlete results (rank, score, time, distance) ○ Competition Results (match and tournament level), ranking, and general information (date, venue etc.) ○ Performance indicators that objectify aspects of performance and an athlete's 'contribution'. These indicators can be tactical, technical, or physical and contain both team and individual metrics. Examples can be splits, GPS data, and frequency data of actions including descriptors (shots, shot type etc.). Please note all indicators a performance analyst handles should have a clear operational definition and known errors of accuracy, reliability and validity ○ Multi-disciplinary data to provide a 'holistic' view of an athlete's performance (e.g. mass, lab and gym performances etc., metrics that relate to an athlete's health) 	<p>every stage of the performance cycle from:</p> <ul style="list-style-type: none"> ○ Modelling and measuring the objective demands of what it takes to win, quantifying what the best in the world look like, where our performers are, and then providing an evidential road map to improvement ○ Supporting the training environment through targeted video and data monitoring delivered in the most relevant and pertinent way to the coach, athlete or multidisciplinary team. ○ Delivering pre competition intelligence through objective profiles of our athletes and the opposition strengths and weaknesses and through supporting the selection process with objective data that is correct and accurate. ○ Delivering simple and effective in competition support with the analyst focused on delivering accessible video feedback and targeted data reporting in real time to provide a performance advantage immediately. ○ Performing a detailed post event analysis to support 	
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	<ul style="list-style-type: none"> ○ 'Subjective comments and opinion from coaches, and significant others 	the debrief process with the objective 'story' of what actually happened.	
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Performance Nutrition	<ul style="list-style-type: none"> ○ Nutrition assessment – dietary intake records, body composition data, Previous medical history, relevant biochemistry data ○ Supplement use ○ Meal plans ○ Consent form for supplement use ○ Letters from medical consultants if relevant ○ Meal photographs and meal logs 	<p>The EIS nutrition team aim to:</p> <ol style="list-style-type: none"> 1. Provide world leading Performance Nutrition Support to British Olympic sports and English National Sport. 2. Influence more meals for more athletes. 3. Set the standard for Performance Nutrition in the UK. 4. Ensure the EIS is the most effective place to be a performance nutritionist. 	
EIS DISCIPLINE	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Performance Innovation	<ul style="list-style-type: none"> ○ Athlete height, weight and performance data which is relevant to any equipment or clothing required for the athlete's sport; ○ Athlete medical data (which will be shared with those members of the Performance Innovation team with a medical or physiotherapy background and only if you have consented and only if relevant to the performance innovation project), ○ athlete training data including photos, video and data capture; ○ athlete competition results. 	The performance innovation team deliver the bespoke technology, data analysis or engineering services required for the athlete in their sport	

EIS Service	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Sports Intelligence	Athlete medical data, athlete training data, athlete personal data, and competition results data and other data relevant to the provision of services to the NGB. Data processing will be required to deliver the service agreed with an NGB, where such an agreement is in place, or to inform and improve the services offered by EIS within the High Performance System.	The Sport Intelligence team sit across EIS and UK Sport and support the High Performance System by using data to inform decision-making. The team provide data systems and deliver data capture, storage and analysis projects for UK Sport, EIS and NGBs.	
EIS Service	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Athlete Health	All data held on EIS systems including medical data	<p>Unless you have requested that your data is restricted to specific individuals, appropriately qualified members of the EIS Athlete Health team will have access to injury and illness data in order to inform sports on injury prevention and management strategies and to inform, and improve the services offered by EIS within the high performance sports system.</p> <p>Your injury and illness data may be shared by the EIS Athlete Health team with medical and non-medical EIS or NGB staff unless you have requested that it be restricted to named individuals (as explained</p>	<p>All members of the athlete health team sign additional confidentiality undertakings in respect of their access to your data.</p> <p>Where you have requested that your data is restricted to "doctors only", such data will remain accessible to the medical doctor member of the athlete health team but will not be shared with any other person and no individual athlete will be identifiable in any reports issued by the medical doctor of the EIS athlete health team.</p> <p>Any other restrictions you have requested on the data will be observed by the Athlete Health</p>

		<p>above). Such data may be shared in differing formats such as electronic or document form or by live dashboards linked to injury type or availability level. Any injury and illness data which is to be shared with your NGB or within EIS may contain your personal details. Your injury and illness data would not be shared with any other party unless steps had been taken to have the data pseudonymised or EIS has received your consent to include your personal details.</p>	<p>team and will not be included in any athlete health reports.</p>
EIS Service	TYPE OF DATA PROCESSED	PURPOSE FOR PROCESSING	ADDITIONAL INFORMATION
Internal research	<p>The specific terms of the personal data being processed will depend on the research project at the time.</p> <p>Additional consent will be obtained for any athlete data used in a research project where the terms of reference require it ie. is not covered by this APN.</p>	<p>EIS is at the forefront of sport science, technology and medical services in elite sport, therefore each discipline will collaborate on cutting edge research and collaborations with a range of institutions and external expertise, in order to utilise leading technology and innovative techniques to offer sports and athletes continual improvement in the best strategies and approaches to enhance performance.</p>	

APPENDIX B
DATA SHARING (WITH JOINT DATA CONTROLLERS, PROCESSORS, THIRD PARTIES AND OTHER 'RECIPIENTS')

Name of Recipient or Category of Recipients	Data Shared	Purpose of Sharing
NGB and coaches	The EIS provides personal data, including sensitive personal data, to your NGB ie. Sport. This may be shared via the PDMS system if the relevant data is held on PDMS.	<p>Sharing with your sport is necessary for the performance of adequate support services. EIS multi-disciplinary teams support the athlete and coach and work proactively to ensure that the coach can have a full understanding of the athlete they are coaching.</p> <p>Both the NGB and EIS shall be jointly responsible for ensuring your data is processed in accordance with the data protection legislation and the terms of the services agreement between EIS and the NGB governs this. Data transferred to your NGB will be held by your NGB in accordance with its data protection policies.</p>
External Medical Experts	Medical records	To obtain specialist advice on an injury or illness which is not available within EIS
UK Sport	Your personal data will be provided to UKS in certain circumstances. Further details about the data shared with UKS and how they process your data can be found in the UKS Data Protection Protocol .	UK Sport is the EIS' parent funding body - some teams sit across both organisations therefore a certain degree of sharing will be necessary, set out either above or in the Protocol linked to the left.
Home Country Sports Institutes	EIS shares medical records (subject to any restrictions requested by you) with Home Countries institutes medical practitioners, if you are on the world class programme. Such data will be held by the HCSI's in accordance with their own data protection policies and retention	Information and knowledge resources are shared with HCSIs to develop practitioners and to inform and improve practice across the UK's high performance sport system. EIS may share selected personal data of athletes to achieve this purpose. Photos and details of interventions and injuries may be shared via

Name of Recipient or Category of Recipients	Data Shared	Purpose of Sharing
	guidelines.	secure online data management systems. Such data shall be held by HCSI's in accordance with their own data protection policies and retention guidelines.
British Olympic Association and the British Paralympic Association	Medical records	<p>EIS operates the Intensive Rehabilitation Unit (IRU) at Bisham Abbey in collaboration with the BOA. In order to provide the services you may require at the IRU, EIS will share your medical data with the BOA. Such data will be held by the BOA in accordance with their data protection policies.</p> <p>On your selection for Team GB for an Olympic or Paralympic Games, the BOA and BPA will be provided with access to your personal data held by the EIS. This will include your medical records which will be passed to the BOA or BPA medical team. The BOA and BPA will hold this data in accordance with their data protection policies and will have continual access to such data until a period after the Olympic or Paralympic Games in order that they may compile their post Games reports.</p>
Commonwealth Games Associations	Medical records	If you are selected by your relevant CGA to participate at a Commonwealth Games, such CGA may be provided with access to your personal data held by the EIS, on and from your selection. This will include your medical records which will be passed to the relevant CGA medical team. The relevant CGA will

Name of Recipient or Category of Recipients	Data Shared	Purpose of Sharing
		hold this data in accordance with their data protection policies and will have continual access to such data until a period after the Commonwealth Games in order that they may compile their post Games reports.
Research institutions and students	<p>The data shared will depend on the terms of reference of the research project at the time.</p> <p>Specific consent will only be obtained for any data used in a research project where required ie. it is not in an anonymised format.</p>	<p>In order to carry out the research mentioned in this Privacy Notice or to perform requested services for your NGB, EIS and, where applicable, UKS, may work collaboratively with Universities and other research institutions. Such research would be carried out under a contract containing strict obligations of confidentiality and compliance with the data protection legislation.</p> <p>EIS may also allow students who are studying a Masters degree or PhD course to have access to its premises, practitioners and athletes for the purpose of completing a thesis or degree report. All athlete data in published reports and thesis will be anonymised unless your consent has been obtained and are carried out under strict obligations of confidentiality and compliance with data protection legislation.</p> <p>EIS may also allow work shadow students who are looking to gain the experience of working in the high performance sport system to have access to its premises to shadow EIS staff. Such students will have access to athlete data and all such placements are carried out under strict obligations of confidentiality and compliance with data protection legislation.</p>

Name of Recipient or Category of Recipients	Data Shared	Purpose of Sharing
Contractors and suppliers	All data required for the contractor or supplier to provide their services, including where necessary to fulfil their role, access to medical records on PDMS	<p>In order to provide a comprehensive service, EIS may engage with contractors who will cover travel, sick leave and to meet the demand of the sports.</p> <p>EIS may also engage with suppliers to provide specialised services which cannot be provided by EIS staff, such as engineering services and software development services.</p> <p>All such suppliers and contractors will have access to athlete data and all such placements are carried out under strict obligations of confidentiality and compliance with data protection legislation.</p>
Facility Operators	CCTV images Names and times for signing in/ appointments/ health and safety reasons	<p>The EIS will share limited information with third parties managing the EIS's facilities, for example, to allow them to manage receptions and appointments.</p> <p>Some of EIS's facilities have CCTV surveillance systems which will therefore capture images of individuals, in order to safeguard them ie. for crime prevention purposes. Cameras located on and within buildings are monitored by trained staff from the building whose areas the cameras are designed to protect.</p>

APPENDIX C
DATA PROCESSING BY EIS BACK OFFICE FUNCTIONS

Function	Data Shared	Purpose of Sharing
Operations	<p>The primary data handled by the operations team is your personal details including name, postal address, Date of Birth, contact telephone number, email address, sport categorisation and GP details. In addition to this from time to time the operations team may also support the processing of your data on PDMS (subject to any requested restrictions made by you). The role of the operations team in handling this data is as part of an administrative service provided to the sports science and sports medicine practitioners.</p>	<p>The Operations team are in place to support all functions of service delivery to you as an athlete and therefore may process your data as required to deliver the bespoke EIS services agreed with the NGB.</p> <p>Data may be processed using a variety of applications, stored on EIS owned/operated machines or servers.</p> <p>Those members of the Operations team that are required to deliver or support the service offered to an NGB or EIS will have access to the data, and will therefore be shared within the team, or with other EIS central support teams to the extent required to deliver the service.</p> <p>Data may be shared with NGBs in order to evaluate what EIS services have been utilised during a defined period. This will include athlete name, site, and delivery by which EIS practitioner.</p> <p>Data may be shared externally if required to deliver the service - e.g. Landlords and service contractors - but only to the extent required to deliver the service and where confidentiality agreements are in place.</p> <p>Competition results may be displayed on notice boards within the EIS, as these are a matter of public record and there is a legitimate interest (lawful basis) to process within the EIS given its key role in the Sporting world.</p>

Function	Data Shared	Purpose of Sharing
Finance	Athlete name, address, bank sort code and account number	<p>The Finance team do not routinely access athlete data, except for athletes competing for NGBs that are directly managed by EIS. In such cases, the purpose for holding the data is to make payments to athletes. This data is held on the email system, and attached to payment receipts that are held on file in the finance office. The finance team will also need to reflect the payment in their own finance system, Sun systems. The data is used by limited EIS Finance staff only and is not shared externally.</p> <p>We may disclose data to our insurance brokers and insurers in order to determine any potential legal claim under EIS insurance policies.</p>
Information Systems	Any data held on any IT system managed by EIS	<p>IT Support for EIS staff is provided by the EIS Information Systems Team and also by employees of external third party service and support providers.</p> <p>EIS IT support staff and such third party providers may require access to the systems which holds your data from time to time to provide such support. Such access is subject to strict obligations of confidentiality within employment or service contracts.</p>
Communications	Video and photo footage	The EIS Communications team will store video/photo footage by way of interviews captured and/or photos and use them for the EIS website, conferences, promotions or social media.

APPENDIX D
LIST OF THE NGBS WE PROVIDE SERVICES TO

The most up-to-date list of these Olympic, Paralympic and Commonwealth Sports, can be found on our website here:

<https://www.eis2win.co.uk/what-we-do/>