



# Data Policy

Last Updated – 01/09/2025 | *This document must be reviewed no less than once per year.*  
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## 1. Purpose

This policy sets out how Oubaitori Karate Kickboxing ("the Club") collects, uses, stores, and protects personal data in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. It ensures transparency with members, parents/guardians, staff, and volunteers, and demonstrates our commitment to safeguarding privacy and complying with the law.

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## 2. Scope

This policy applies to all personal data processed by Oubaitori Karate Kickboxing. It covers data relating to members, parents/guardians, staff, volunteers, and other individuals whose personal data the Club may hold.

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## 3. Data Controller & Contact Information

Oubaitori Karate Kickboxing is the Data Controller for all personal data it processes.

- **Data Protection Contact:** Matt Johnson
- **Email:** matt@oubaitori.uk
- **ICO Registration Reference:** ZB973840

All requests regarding data protection should be directed to the contact above.

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## 4. Data Collected

The Club may collect and process the following categories of data:

- **Member & Parent/Guardian Details:** names, addresses, contact numbers, email addresses, date of birth, gender/pronouns, emergency contact details.  
**Medical & Wellbeing Information:** allergies, medical conditions, injuries, SEN information, health forms (PAR-Q).  
**Operational Information:** attendance registers, grading records, competition entries/results, licence and insurance references, membership packages, tags for segmentation, technical information (e.g. grading scores, individual training/learning plans, lesson plans, technical analysis), height, weight, and years experience.

- **Diversity & Compliance:** ethnicity, neurodiversity, LGBTQIA+ information (optional, where provided).
  - **Consent Records:** photos/videos, social media use, marketing preferences, group chat consent.
  - **Staff/Volunteer Records:** qualifications, safeguarding/DBS checks, role allocations.
  - **Communications:** records of digital and physical communications sent to, and received from, students and their representatives.
  - **Multimedia Content:** photos and videos for promotional, marketing, analysis, and operational purposes (for example, using group photos to ratify registers). Promotional and marketing information is utilised only with relevant consent
  - **Data Required for Statutory Purposes:** safeguarding records, accident and incident forms, relevant witness statements, and other information required for the legal and effective handling of statutory and insurance-based requirements.
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## 5. Data Storage & Access

- Personal data is stored securely on **Johonbu (EU-based servers)** and **Google Drive**.
  - Access is restricted to:
    - Matt Johnson (Lead Coach & Data Protection Contact)
    - Felicity Johnson (Secretary/Operational Support)
    - Emily Pianu (Membership & Governance Director, where required)
  - Data may also be shared with **regulatory bodies** (e.g. BMABA, Kickboxing GB, WAKO, WKU, insurers, safeguarding agencies) if legally or operationally required
  - Data may be shared for operational requirements, for example weight, height, grade, and years training for competition entries
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## 6. Third-Party Processors

The Club uses trusted third-party services that process personal data on its behalf:

- Johonbu (membership management system)
- Google Workspace (document storage & communications)
- Mailgun / Mailchimp (email communications)
- Twilio (SMS communications)
- WhatsApp / Facebook (optional group communications, with consent)
- Stripe / GoCardless (payment providers, where applicable)
- SportData, SmoothComp, Kihapp, and other competition platforms (Competitors Only)

All third parties are expected to comply with GDPR and maintain appropriate security standards

WhatsApp is used by the Club solely as an optional broadcast/update channel (e.g. training reminders, cancellations). No records are stored, and no data is processed through WhatsApp beyond routine communications. For under-18

members, explicit parental consent is required, and alternatives (email/SMS) are always available. Only Club staff act as administrators, and groups are for updates and community, not storage of data. We cannot guarantee parents will not post information relating to their own children.

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## 7. Lawful Bases for Processing

The Club processes personal data under the following lawful bases:

- **Contract** – to provide martial arts training, membership services, gradings, competitions, and communications.
  - **Statutory & Regulatory Obligations** – safeguarding, health & safety, financial reporting, accident/incident recording.
  - **Consent** – for photography, videos, marketing, and participation in communication platforms such as WhatsApp/Facebook.
  - **Legitimate/Operational Interests** – day-to-day club administration, member communications, and governance.
  - Where the Club processes special category data (e.g. health, ethnicity, SEN, LGBTQIA+ information), this is done under Article 9(2) of UK GDPR, primarily for EDI purposes, safeguarding, health and safety, or with explicit consent
  - **Article 9(2)(c) - Vital Interests** We may share information with third parties we deem appropriate in the event of an emergency, for example paramedics, medics at competitions or partners/personnel we reasonably deem require information in the explicit interests of safety and safeguarding
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## 8. Data Retention

- General membership, attendance, and operational records: **6 years** after membership ends.
  - Records relating to children: retained until the individual turns **24 years old** (18 + 6 years statutory requirement).
  - Financial records: **6 years** (to meet HMRC requirements).
  - Safeguarding and accident records: retained in line with statutory obligations (minimum 25 years if required).
  - Photos and videos (multimedia content): retained until consent is withdrawn or operational use is no longer required (e.g. where stock imagery, reflective posting, or record-keeping purposes have expired)
  - Competition results are retained indefinitely in line with legitimate interests as part of the Club's historic archive and performance tracking, limited strictly to essential details (name, category, ruleset, and result).
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## 9. Data Sharing

The Club will only share personal data where necessary for lawful purposes, such as:

- With BMABA, insurers, or safeguarding bodies.  
With regulatory/statutory authorities if required by law.
- With approved third-party processors as outlined in Section 6.
- For legitimate operational need, for example competition entries or seminar/squad training registrations

Where possible, Data Processing Agreements (DPAs) are maintained with third-party providers to ensure GDPR compliance. In cases where this is not feasible (for example, with competition entry platforms such as SportData, SmoothComp, or Kihapp), the Club will only share the minimum data required for lawful participation (e.g. name, weight, age/grade, and competition category) and will notify members/parents accordingly. The Club continuously reviews third-party providers for GDPR compliance and security standards.

Where information must be shared with third parties for the purposes of competitions or training opportunities, parents will be proactively informed.

Personal data will **never be sold** to third parties.

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## 10. Data Security

- All digital systems are password-protected with restricted access.
- Paper records (if any) are stored securely.
- Data is only accessed by authorised individuals for legitimate purposes.
- In the event of a suspected data breach, procedures will be followed as outlined below.

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## 11. Data Breach Management

- The **Club Management/Board** is responsible for investigating and reporting any personal data breaches.
- Serious breaches will be reported to the ICO within **72 hours**.
- Where there is a high risk to individuals, affected members will be informed promptly and advised on steps they can take.
- All breaches, regardless of severity, will be documented in the Club's internal breach log.
- Breaches will be assessed against the ICO's reporting threshold. Where reporting is not required, justification will be documented in the breach log.

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## 12. Data Subject Rights



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Members (or parents/guardians on behalf of children) have the right to:

- Access their personal data.
- Request corrections to inaccurate information.
- Request deletion of personal data (where lawful).
- Restrict or object to processing.
- Withdraw consent (e.g. for marketing or photos).
- Children may exercise their own data rights as they gain sufficient understanding, typically from age 13 upwards, in line with ICO guidance.

Requests should be made directly to **Matt Johnson at matt@oubaitori.uk**.

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## 13. Monitoring & Review

This policy will be reviewed annually, or sooner if required by changes in legislation or Club operations.

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### Signed:

Matt Johnson  
Lead Instructor & Data Protection Contact  
Oubaitori Karate Kickboxing

Date	Comment	Author
02/09/2025	Policy Published	Matt Johnson