Privacy Policy

BowlsWales · BowlsCymru

Document type	Policy
Version	V5
Last reviewed	October 2026
Next review	October 2028
Approved by	BowlsWales Board
Owner	Chief Executive

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Introduction

BowlsWales is committed to respecting and protecting the privacy of all personal data that we control and process on behalf of those individuals who interact with us. This policy explains how we comply with the law on data protection and sets out your rights.

References to we, our or us in this policy relate to BowlsWales, Sport Wales National Centre, Sophia Gardens, Cardiff, CF11 9SW (Company Number 10838128).

We are not required to appoint a Data Protection Officer. The BowlsWales Board has overall accountability for data protection compliance. Day-to-day responsibility for ensuring compliance is delegated to the Chief Executive.

1. Who This Policy Applies To

This policy may apply to you if you are any of the following:

- An individual player or participant in bowls who has registered their interest in participating in the sport, or whose details we or our member organisations have collected from affiliated clubs or other third parties.
- A coach or official who has registered for membership or accreditation with BowlsWales or one of its member organisations.
- A fan, participant or supporter of bowls who has contacted us or a member organisation to sign up for updates about upcoming events or ways to get involved.
- A representative of a member organisation of BowlsWales.
- A volunteer who has agreed to work in a specific capacity.
- A contact representative of a club or organisation that has purchased goods or services provided by BowlsWales.
- An individual who subscribes to our newsletters or updates.
- An individual who participates in one of our surveys or questionnaires.
- An individual who features in our articles or newsletters.
- An individual who contacts us with an enquiry or complaint.

2. Personal Information We May Collect

Personal information we may collect from you includes:

- Personal contact details such as name, title, email address, telephone number and postal address.
- Age, date of birth and gender.
- Which code(s) of bowls you participate in (e.g. indoor, lawn, crown green, short mat).
- Your club and organisational affiliations.
- Whether you currently coach or officiate in bowls, and any related qualifications, credentials or accreditations you hold.
- Welsh language ability (understanding, speaking, reading, writing).
- Whether you require any adjustments or support to take part in bowls.
- Whether you have caring responsibilities.
- Whether you are interested in coaching, officiating or volunteering.
- Details of your interactions with us.
- Records of attendance at events or competitions.
- How long you have been playing, and how often you play, each code of bowls.
- Images in video and/or photographic form and voice recordings.

- Marketing contact preferences.

3. Special Categories of Personal Information

We may also collect, store and use the following special categories of more sensitive personal information:

- Information about race and ethnicity.
- Religious beliefs.
- Sexual orientation.
- Whether you identify as transgender.
- Whether you consider yourself to have a disability or long-term health condition.
- Information about your health, including any medical condition, health and sickness records, medical records and health professional information.

We may not collect all of the above types of special category information about you. Where we do process special category personal data, we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis.
- It is necessary for the establishment, exercise or defence of legal claims.
- It is necessary for the purposes of carrying out obligations and exercising rights in the field of employment and social security and social protection law.
- It is based on your explicit consent.

We may also collect criminal records information from you. For criminal records history, we process it on the basis of legal obligations or based on your explicit consent.

3A. Equality Monitoring

As part of the JustGo membership registration, we ask voluntary questions about your ethnicity, disability status, religion, transgender status, sexual orientation, and caring responsibilities. These questions use the same categories as the national Census and other UK sports bodies.

We collect this information to understand who is taking part in bowls across Wales, so we can make the sport more welcoming and accessible to everyone, and to meet our reporting commitments to Sport Wales under the Moving to Inclusion framework.

You do not have to answer any of these questions. Choosing not to answer, or selecting "Prefer not to say", will not affect your membership in any way.

Your individual answers are confidential. BowlsWales and your national governing body can only see overall, aggregated figures — for example, the percentage of members who identified in a particular way. No one can see how you personally answered these questions. Where fewer than six people gave the same answer, that figure is hidden entirely so that no individual can be identified.

You can update or remove your equality monitoring answers at any time by logging into your JustGo profile.

4. Where We Collect Your Information

Personal data is primarily collected when you register as a member of bowls in Wales through JustGo (bowlswales.justgo.com), our online membership platform provided by

Azolve Ltd. Personal data may also be collected when you contact us to volunteer, enter an event, or interact with BowlsWales by other means.

Azolve Ltd (trading as JustGo) processes your personal information on our behalf as a data processor. They are bound by a written contract that limits their use of your data to the instructions given by BowlsWales. JustGo is UK GDPR compliant and registered with the Information Commissioner's Office. JustGo's own privacy policy is available at agreements.justgo.com/privacy-policy.

If you provide us with details of referees, next of kin, beneficiaries, family members or emergency contacts, those individuals have a right to know and be aware of how their data is handled. Please share this privacy notice with them where appropriate. They have the same rights as set out in section 11 below.

5. Uses Made of the Information

The main purposes for which we process your personal information, the categories of information used and the lawful basis for doing so are set out in the table below.

Purpose	Personal information used	Lawful basis
Administer any membership or working relationship you have with us and manage our relationship with you, including dealing with any support or service enquiries.	All contact and membership details, records of your interactions with us, and marketing preferences.	Necessary to enable us to professionally manage and administer our operations.
Maintain a national register of bowls participants in Wales to support safeguarding compliance, accurate reporting to Sport Wales and other statutory funders (including by age band and geographic spread of participation), and strategic planning for the sport.	Contact and membership details, date of birth, home address, code(s) of bowls, club affiliations, playing history, coaching and officiating status, DBS and qualification records.	Legitimate interest in governing the sport responsibly and meeting statutory funder requirements.
Verify that coaches, officials and volunteers hold current DBS checks, safeguarding training and any required qualifications.	Name, coaching/officiating status, DBS certificate details, qualification and credential records.	Legitimate interest in safeguarding; legal obligation where applicable.
Understand the demographic makeup of bowls in Wales and meet equality and inclusion reporting commitments to Sport Wales.	Aggregated equality monitoring data (ethnicity, disability, religion, transgender status, sexual orientation, caring responsibilities). Individual answers are not used.	Explicit consent (equality monitoring questions are voluntary) and substantial public interest in equality of opportunity in sport.
Distribute information as part of BowlsWales' role as the national coordinating body for bowls in Wales.	All contact, membership and volunteer details.	Legitimate interest in professionally administering our operations.
Distribute marketing material, newsletters, event details and information about our commercial partners and the wider sport.	All contact and membership details and marketing preferences.	Explicit consent, or where we reasonably consider sending such information to be in your legitimate interest.
Respond to enquiries or complaints.	Contact details and records of your interactions with us.	Normal business activity.

Purpose	Personal information used	Lawful basis
Retention of records.	All personal data we control and process.	Contract basis for most data we process. In certain circumstances we have a legal obligation to retain records.
Security of our IT systems.	Your usage of our IT systems and online portals.	Legitimate interest in ensuring our IT systems are secure.
Promoting the sport of bowls.	Images in video and/or photographic form.	Explicit consent, or where the use of such images is compliant with the special purposes provisions of UK GDPR.

Where you have given us consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time by contacting us as described in section 15 below. Please note that withdrawal of consent will not affect any use of the data made before you withdrew it, and we may still be entitled to hold and process the relevant personal information on other lawful bases.

6. Direct Marketing

From time to time, we may contact you by email or post with information about BowlsWales and the sport of bowls that we believe may be of interest to you. We will only send marketing messages in accordance with the marketing preferences you have set. You can let us know at any time that you do not wish to receive marketing messages, or unsubscribe by clicking the link in any marketing email we send.

7. Disclosure of Your Personal Information

We share personal information with the following parties:

- Any party approved by you.
- Our member organisations and regional bodies for the sport of bowls, for the purpose of administering membership within their code of bowls. Member organisations can see membership details (name, contact information, club, code of bowls, coaching and officiating status) for members within their own code only. They cannot see members belonging to other codes.
- Azolve Ltd (trading as JustGo), who provide our membership platform and process your data on our behalf under a written data processing agreement. JustGo does not use your data for their own purposes.
- Sport Wales and other statutory funders, where required for funding compliance or reporting purposes.
- The Government or our regulators, where we are required to do so by law or to assist with their investigations or initiatives.
- Police and law enforcement agencies, to assist with the investigation and prevention of crime.

We do not disclose personal information to anyone else except as set out above.

We will never sell your personal data to third parties for marketing or commercial purposes.

8. Where Your Data Is Stored

Your personal data is stored and processed within the United Kingdom. Our membership platform, JustGo, is provided by Azolve Ltd, a UK-based company. If this position ever changes, we will update this policy and ensure appropriate safeguards are in place in accordance with UK data protection law.

9. Safeguarding Data

BowlsWales has a duty to ensure that everyone involved in the sport of bowls in Wales — particularly children and vulnerable adults — is able to participate in a safe environment. To fulfil this duty, we use information held on our membership platform to verify that coaches, officials and volunteers hold current DBS checks, have completed required safeguarding training, and hold any qualifications their role requires. We also use date of birth to identify members under 18, so that the appropriate safeguarding measures can be applied to them.

There will also be occasions where, in conjunction with our member organisations, we need to be aware of and share personal data linked to specific safeguarding concerns in the wider sport of bowls. Such personal data will be processed on a lawful basis in line with the requirements of the organisation at that time.

Safeguarding data may be shared with the Welsh Sports Association, Sport Wales, the Disclosure and Barring Service, and statutory agencies where required.

Your postal address may also be used to support safeguarding, including where we need to share it with the police or other statutory agencies as set out in section 7.

10. How Long We Keep Personal Information

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it. In some cases, personal information may be retained on a long-term basis where we need to do so for legal purposes.

Generally, where there is no legal requirement, we retain all physical and electronic records for a period of seven years after your last contact with us. An exception applies to information that may be relevant to personal injury or discrimination claims, which may be retained until the applicable limitation period has expired.

It is important that the personal information we hold about you is accurate and up to date. Please let us know if anything changes by contacting us using the details in section 15 below.

11. Your Rights in Relation to Personal Information

You have the following rights in relation to your personal information:

- The right to be informed about how your personal information is being used.
- The right to access the personal information we hold about you.
- The right to request the correction of inaccurate personal information we hold about you.
- The right to request the erasure of your personal information in certain limited circumstances.
- The right to restrict processing of your personal information where certain conditions are met.

- The right to object to the processing of your personal information.
- The right to request that we transfer elements of your data either to you or to another service provider.

Please note that some of these rights have specific requirements and exemptions and may not apply in all circumstances. We do not use automated decision-making in relation to your personal data.

More information about your legal rights can be found on the Information Commissioner's website at ico.org.uk/for-the-public.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us using the details in section 15 below. If you are unhappy with the way we are using your personal information, you also have the right to complain to the UK Information Commissioner's Office (ICO). We would encourage you to contact us first so that we can try to resolve your concern.

12. Changes to This Policy

We may update this privacy policy from time to time. When we make a material change, we will update the version date. For significant changes, we will try to give you reasonable notice and, where required by law, seek your consent.

13. Security

We employ a variety of technical and organisational measures to keep your personal data safe. Whilst no transfer of information over the internet or storage of information can be guaranteed to be 100% secure, we take all reasonable steps to protect the personal data we hold.

14. Cookies

Our website uses cookies. Please refer to our separate Cookies Policy, available at bowlswales.com, for full details. This privacy policy covers only the BowlsWales website at bowlswales.com.

15. Contacting Us

In the event of any query or complaint in connection with the information we hold about you, please contact us at:

Email: enquiries@bowlswales.com

Post: BowlsWales, Sport Wales National Centre, Sophia Gardens, Cardiff, CF11 9SW

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