

NNL GDPR Policy	 Netbal Nederland
No: NNL-AD-08-1.1	

Policy for Collecting and Processing Members' Personal Data (Including Medical Information) Netbal Nederland – GDPR Compliant

1. Purpose of this Policy

This policy explains how Netbal Nederland collects, uses, stores, and protects the personal data of its members, including limited medical information, in accordance with the General Data Protection Regulation (GDPR) and applicable Dutch privacy laws.

2. What Personal Data We Collect

Netbal Nederland collects only the personal data necessary for membership administration, athlete safety, communication, and reporting requirements.

The personal data we may collect includes:

- Name, address, and postal code
- Gender
- Date of birth (used to determine age categories for participation and reporting)
- Email address (used for communication regarding membership, events, and administrative matters)
- Medical Information (Special Category Data)
Where necessary for the safety and wellbeing of athletes, we may also collect limited medical information, such as:
 - Injury information
 - Emergency medical details, such as emergency contact name and telephone number.

This data will only be collected where strictly necessary to ensure safe participation in netball activities. We do not collect unnecessary or excessive medical or sensitive data.

3. Purpose of Data Collection

Members' personal and medical data is collected and processed for the following purposes:

- Membership administration
- Communication regarding netball activities, competitions, and updates.
- Ensuring the health, safety, and wellbeing of athletes during training and events.
- Emergency response and medical support if required.
- Statistical reporting and compliance requirements for NOC*NSF.
- Supporting the development and organization of netball activities in the Netherlands.
- Personal data will not be used for commercial marketing purposes.
- Maintaining safeguarding records
- Processing insurance or accident reports

- Complying with legal obligations

4. Legal Basis for Processing

Netbal Nederland processes personal data only where there is a lawful basis to do so under the General Data Protection Regulation (GDPR).

Depending on the purpose of the processing, we rely on one or more of the following legal bases:

Processing Activity	Legal Basis
Membership registration and administration	Performance of a contract (Article 6(1)(b) GDPR)
Communication regarding membership, competitions, training, events and administration	Performance of a contract (Article 6(1)(b)) and, where appropriate, Legitimate Interests (Article 6(1)(f))
Compliance with reporting and legal obligations, including reporting to NOC*NSF	Legal obligation (Article 6(1)(c))
Organisation and development of netball activities, safeguarding, and maintaining accurate membership records	Legitimate interests (Article 6(1)(f))

4.1 Processing of Special Category Data (Medical Information)

Medical information is classified as Special Category Personal Data under Article 9 of the GDPR and is processed only where it is necessary and permitted by law.

Netbal Nederland processes limited medical information solely for the purpose of protecting the health, safety and wellbeing of members participating in netball activities.

Medical information will be processed on the basis of:

- **Explicit consent** of the member, or the parent or legal guardian where required (Article 9(2)(a) GDPR); and/or
- **Protection of the vital interests** of the member where processing is necessary in an emergency to protect life or health (Article 9(2)(c) GDPR).

Medical information is collected only where strictly necessary, is accessed only by authorised individuals on a need-to-know basis, and is not used for any unrelated purpose.

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4.2 Information Shared with NOC*NSF

Where required for membership registration, funding eligibility, statistical reporting or other legal or regulatory obligations, Netbal Nederland may share limited personal information with NOC*NSF, including:

- Date of birth
- Gender
- The last four digits of the member's postal code

Only the minimum information necessary for these purposes will be shared.

4.3 Withdrawal of Consent

Where processing is based on consent, members may withdraw that consent at any time by contacting Netbal Nederland.

Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn. It may, however, affect our ability to provide certain services or ensure the safe participation of members in netball activities where the information is necessary for those purposes.

4.4 Processing of Performance and Injury Data for Elite Pathways

By deviation from Section 2.2, athletes selected for National Squads, Development Pathways, or Elite Representation Teams are subject to specialized high-performance monitoring.

- Explicit Performance Consent:** In accordance with Article 9(2)(a) GDPR, elite athletes must sign an explicit, separate Medical Data Disclosure Rider within their Athlete Agreement. This legal rider authorizes NNL-appointed medical staff and physiotherapists to process and share relevant injury history, rehabilitation progress, and load-monitoring biometric data with the coaching staff.
- Purpose Limitation:** This processing is strictly limited to ensuring safe athletic participation, calculating physical workload capacities, preventing reinjury, and verifying selection availability.
- Access Controls:** Detailed diagnostic records remain under the custody of licensed medical professionals. Only the direct operational training impacts (e.g., clearance levels or movement restrictions) shall be distributed to team coaches.

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5. Data Sharing

Personal data may be shared only with:

NOC*NSF

Netbal Nederland may share limited personal information with NOC*NSF where required for membership registration, funding eligibility, statistical reporting, governance requirements, or other legal or regulatory obligations.

Only the minimum information necessary for these purposes will be shared.

Coaches, team managers and authorised officials

Where necessary to protect the health, safety and wellbeing of members, relevant personal information, including limited medical information, may be shared with authorised coaches, team managers, first aid personnel or other designated officials.

Only information that is necessary for the safe participation of the member will be shared, and access will be limited to those with a legitimate need to know.

Netbal Nederland may use trusted third-party service providers to assist with the administration of the organisation. These providers may process personal data on our behalf for purposes such as:

- Membership administration
- Email and communications
- Cloud storage and document management
- Website hosting and online services
- Payment processing
- IT support and system security

No Commercial Sharing

Netbal Nederland does not sell, rent or otherwise disclose members' personal data to third parties for commercial or marketing purposes.

Medical information is shared only where necessary to protect the health or safety of the member and only with authorised individuals on a strict need-to-know basis.

6. Data Storage and Security

Netbal Nederland takes appropriate technical and organisational measures to protect personal and medical data, including:

- Secure, password-protected systems

- Two-factor authentication where possible
- Restricted access to authorized officials only
- Additional access restrictions for medical data
- Regular review of access permissions
- Medical data is stored with enhanced confidentiality and access controls.

Netbal Nederland maintains procedures for identifying, investigating and responding to personal data breaches. Where a personal data breach is likely to result in a risk to the rights and freedoms of individuals, it will be reported to the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) and, where required by law, affected individuals will also be notified.

Although Netbal Nederland takes reasonable steps to protect personal data, no electronic storage or transmission system can be guaranteed to be completely secure. We continually review our security measures to maintain an appropriate level of protection.

7. Data Retention

Netbal Nederland retains personal data only for as long as it is necessary to fulfil the purposes for which it was collected or to comply with legal, regulatory and operational requirements.

Unless a longer retention period is required by law, personal data will generally be retained as follows:

Record Type	Retention Period
Membership records	Duration of membership and up to two years after membership ends
Financial and accounting records	Seven years, in accordance with applicable legal requirements
Medical information	Only for as long as it is necessary to protect the health and safety of the member
Incident or accident records	For the period required by applicable legal, insurance or safeguarding obligations

Medical information will be deleted when it is no longer relevant, when consent is withdrawn (where consent is the legal basis for processing), or when there is no longer a lawful basis for retaining the information.

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When the applicable retention period has expired, personal data will be securely deleted or anonymised in accordance with GDPR requirements.

8. Rights of Members

Under GDPR, members have the right to:

- The right to access the personal data held about them.
- The right to request correction of inaccurate or incomplete personal data.
- The right to request the deletion of personal data where there is no lawful reason for its continued processing.
- The right to request restriction of the processing of personal data in certain circumstances.
- The right to object to the processing of personal data where processing is based on legitimate interests.
- The right to withdraw consent at any time where processing is based on consent. Withdrawal of consent does not affect the lawfulness of processing carried out before consent was withdrawn.
- The right to receive personal data in a structured, commonly used and machine-readable format, and to request that it be transferred to another organisation where applicable (the right to data portability).
- The right not to be subject to a decision based solely on automated processing, including profiling, that produces legal or similarly significant effects. Netbal Nederland does not carry out automated decision-making or profiling.

Members may exercise their rights by contacting Netbal Nederland using the contact details provided in this policy.

Netbal Nederland will respond to requests without undue delay and, in most cases, within one month of receiving the request. Where necessary, we may request proof of identity before responding to protect personal data from unauthorised access.

9. Contact Information

For questions, requests, or concerns regarding personal data, please contact:

Netbal Nederland

Email: info@netbalnederland.nl

10. Automated Decision-Making

Netbal Nederland does not use automated decision-making or profiling when processing members' personal data.

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11. POLICY REVIEW AND AMENDMENTS

- 11.1 This policy will be reviewed annually by the Board to ensure it reflects international best practices in sports conduct management and safety frameworks.
- 11.2 Any permanent structural updates, additions, or modifications to this policy must be formally approved by the Bond Council, provided the proposed changes were included with an explanation in the meeting's notice.

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