

Last updated on 17 January 2023

Welcome to the privacy policy (the “**Privacy Policy**”) of:

- **LONDON MARATHON EVENTS LIMITED** (company number 01528489) of 190 Great Dover Street, London, England, SE1 4YB; and
- **THE LONDON MARATHON CHARITABLE TRUST LIMITED** (company number 01550741) of 190 Great Dover Street, London, England, SE1 4YB (“**The Trust**”),

(collectively, the “**London Marathon Group**”).

This Privacy Policy is issued on behalf of the London Marathon Group so when We refer to “**We**”, “**Us**” or “**Our**” in this Privacy Policy, We are referring to the relevant company in the London Marathon Group responsible for processing your data.

We respect your privacy and are committed to protecting your personal data. This Privacy Policy will inform you as to how We look after your personal data when you visit Us at:

- www.tcslondonmarathon.com;
- www.lmct.org.uk;
- www.thebighalf.co.uk;
- www.vitalitywestminstermile.co.uk;
- www.vitalitylondon10000.co.uk;
- www.cityrace.co.uk;
- www.ridelondon.co.uk;
- www.swimserpentine.co.uk;
- www.brightonmarathonweekend.co.uk;

and/or

- any of the other websites and/or mobile applications that are operated by the London Marathon Group,

(collectively, the “**Site**”),

regardless of where you visit it from, and tell you about your privacy rights and how the law protects you.

This Privacy Policy is provided in a layered format so you can click through to the specific areas set out below. Please also use the [Glossary](#) to understand the meaning of some of the terms used in this Privacy Policy.

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1 IMPORTANT INFORMATION AND WHO WE ARE

1.1 PURPOSE OF THIS PRIVACY POLICY

1.1.1 This Privacy Policy aims to give you information on how We collect and process your personal data through your use of the Site, including any data you may provide through the Site for the reasons specified in paragraph 3.1 below.

1.1.2 We may collect data relating to children for the reasons detailed in paragraph 4.4 below. For more information on Our policy on children's personal data, please see paragraph 4.12.

1.1.3 It is important that you read this Privacy Policy together with any other privacy notice or fair processing notice We may provide on specific occasions when We are collecting or processing personal data about you so that you are fully aware of how and why We are using your data. This Privacy Policy supplements the other notices and is not intended to override them.

1.2 CONTROLLER

1.2.1 LONDON MARATHON EVENTS LIMITED which is part of the London Marathon Group is generally the controller (except in the context of grants, where it acts as joint controller with The Trust – please see paragraph 10.2.1.1.1 for more information) and responsible for the Site.

1.2.2 We have appointed a data protection officer (the “DPO”) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the following details:

Full name of legal entity	LONDON MARATHON EVENTS LIMITED
Name or title of DPO:	Paul Hepburn
Email address:	privacy@londonmarathonevents.co.uk
Postal address:	190 Great Dover Street, London, England, SE1 4YB
Telephone number:	0207 902 0200

- 1.2.3 You have the right to make a complaint at any time to the Information Commissioner's Office (the "ICO"), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please Contact Us in the first instance.

1.3 CHANGES TO YOUR PERSONAL DATA

It is important that the personal data We hold about you is accurate and current. Please keep Us informed if your personal data changes during your relationship with Us.

1.4 THIRD-PARTY LINKS

The Site may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave the Site, We encourage you to read the privacy policy of every website you visit.

2 THE DATA WE COLLECT ABOUT YOU

- 2.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 2.2 As further detailed in the table at paragraph 4.4, We may collect, use, store and transfer different kinds of personal data about you which We have grouped together as follows:
- 2.2.1 "**Identity Data**" includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth, photographs, vehicle registration number(s), bib / race number, age, gender, qualifications, professional membership details and insurance details.
- 2.2.2 "**Contact Data**" includes billing address, residential address, delivery address, email address, social media handles and telephone numbers.
- 2.2.3 "**Financial Data**" includes bank account and payment card details.
- 2.2.4 "**Transaction Data**" includes details about payments to and from you and other details of products and services you have purchased from Us.
- 2.2.5 "**Technical Data**" includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, full 'Uniform Resource Locators' clickstream to, through and from the Site (including date and time) and other technology on the devices you use to access the Site.
- 2.2.6 "**Profile Data**" includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses, performance, results and times at Our events, products you viewed or searched for, page response times, download errors, length of visits to certain pages, and page interaction information (such as scrolling, clicks, mouse-overs and methods used to browse away from the page).
- 2.2.7 "**Usage Data**" includes information about how you use the Site, products and services.
- 2.2.8 "**Marketing and Communications Data**" includes your preferences in receiving marketing from Us and Our third parties and your communication preferences.

- 2.3 We also collect, use and share “**Aggregated Data**” such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, We may aggregate your Usage Data to calculate the percentage of users accessing a specific Site feature. However, if We combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, We treat the combined data as personal data which will be used in accordance with this Privacy Policy.
- 2.4 As further detailed in the table at paragraph 4.4, We may also collect personal data that includes “Sensitive” or “Special Categories” of personal data (also known as “**Special Category Data**”), such as dietary requirements, details about your race or ethnicity, information about your health, genetic and biometric data and certain medical and health information (including whether or not you are a wheelchair user) and where required to ensure a safe environment and adherence to government instructions and guidelines.

2.5 IF YOU FAIL TO PROVIDE PERSONAL DATA

Where We need to collect personal data by law, or under the terms of a contract We have with you and you fail to provide that data when requested, We may not be able to perform the contract We have or are trying to enter into with you (for example, to provide you with goods or services). In this case, We may have to cancel a product or service you have with Us but We will notify you if this is the case at the time.

3 HOW IS YOUR PERSONAL DATA COLLECTED?

- 3.1 We use different methods to collect data from and about you including through:
- 3.1.1 Direct interactions. You may give Us your Identity Data, Contact Data, Financial Data and personal data listed in paragraph 2 by filling in forms, attending Our premises or events or by corresponding with Us by post, phone, email or otherwise. This includes personal data you provide when you:
- 3.1.1.1 apply for Our products or services;
 - 3.1.1.2 create an account on the Site;
 - 3.1.1.3 subscribe to Our service or publications;
 - 3.1.1.4 request marketing to be sent to you;
 - 3.1.1.5 apply to participate in one of Our events;
 - 3.1.1.6 volunteer in some capacity at one of Our events;
 - 3.1.1.7 sign up to Our educational or charitable programmes;
 - 3.1.1.8 enter a competition, promotion or survey;
 - 3.1.1.9 attend at Our premises or events; or
 - 3.1.1.10 give Us some feedback.
- 3.1.2 Automated technologies or interactions. As you interact with the Site, We may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites. Please see Our [cookie policy](#) (the “**Cookie Policy**”) for further details.

- 3.1.3 Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources such as analytics providers, advertising networks, technical, payment and delivery services, data brokers or aggregators and publicly available sources such as Companies House and the Electoral Register based inside the UK. Please [Contact Us](#) to find out more about the various third parties and public sources from which We may receive personal data about you.

4 HOW WE USE YOUR PERSONAL DATA

- 4.1 We will only use your personal data when the law allows Us to. Most commonly, We will use your personal data in the following circumstances:
- 4.1.1 Where We need to perform the contract, We are about to enter into or have entered into with you.
- 4.1.2 Where it is necessary for Our Legitimate Interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- 4.1.3 Where We need to Comply with a Legal or Regulatory Obligation.
- 4.2 Please [Contact Us](#) to find out more about the types of lawful basis that We will rely on to process your personal data.
- 4.3 Unless you are under the age of 13 (for more information, please see paragraph 4.12) or unless otherwise provided in the table at paragraph 4.4 below, We do not generally rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [Contacting Us](#).

4.4 PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

- 4.4.1 We have set out below, in a table format, a description of all the ways We plan to use your personal data, and which of the legal bases We rely on to do so. We have also identified what Our Legitimate Interests are where appropriate and the period for which We retain your personal data. For the avoidance of doubt, please be aware that where We use a specific type of personal data for more than one reason and there is a conflict between the retention period for each such use in the table below, the longest retention period shall prevail.
- 4.4.2 Note that We may process your personal data for more than one lawful ground depending on the specific purpose for which We are using your data. Please [Contact Us](#) if you need details about the specific legal ground We are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of Legitimate Interest	Retention period (not exceeding)
To enable you to apply to participate, or participate, or to organise a team, in any of Our events	(a) Identity Data (b) Contact Data (c) Transaction Data (d) Technical Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (We need this data to be able to allow you to participate in Our events and to stage Our events.)	5 years from last application to participate

	(e) Profile Data (f) Marketing and Communications Data		
To facilitate and publish the results of Our events	(a) Identity Data (b) Profile Data	Necessary for Our Legitimate Interests (We need the ability to publish and store the results, rank individuals and challenge results after the specific event, and keep a historic log of this data all for the purpose of staging the event(s) and for archival and historic research. This also allows participants to rank themselves against other participants.)	In perpetuity
To televise, film, photograph and/or otherwise record Our events	Identity Data	Necessary for Our Legitimate Interests (We need the ability to publish, display, sell and distribute Our events by means of film, television, radio, print media, internet, publicity material or any other media now or in the future.)	In perpetuity
To provide the official London Marathon application(s) and enable the functions and features within any such official London Marathon application(s).	(a) Identity Data (b) Contact Data (c) Transaction Data (e) Technical Data	(a) Performance of a Contract with you (the provision of the application in accordance with its terms of use) (b) Consent (for the function that allows your location in the relevant London Marathon to be known by your safety supporter(s))	Subject to the other rows of this table in relation to a participant's participation at the London Marathon, with respect solely to Our provision of any application(s), 90 days from date of the relevant London Marathon.
To invite you to participate, and for you to participate, in Our hospitality	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (We need this data to be able to give you the option to attend, and to provide	3 years since the last invitation or purchase, whichever is later

		you with, high-quality hospitality.)	
To enable you to volunteer at Our events	(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (We need this data to be able to allow you to participate in Our event(s) as a volunteer.) (c) Necessary to Comply with a Legal or Regulatory Obligation (including security and safety at Our events and for tax purposes)	3 years since your last application to volunteer
To enable you to provide your services on a casual labour basis to Us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Profile Data (f) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (We need this data to be able to contact you about becoming a service provider to Our event(s).) (c) Necessary to Comply with a Legal or Regulatory Obligation (including security and safety at Our events and for tax purposes)	7 years since you applied for your last role
To enable you to be included on Our media lists	(a) Identity Data (b) Contact Data (c) Marketing and Communications Data	Necessary for Our Legitimate Interests (We need this data to be able to enable Our events to be covered in the media.)	3 years
To enable you to be a partner, sponsor or supplier or potential partner, sponsor or supplier of or to Us or Our events	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a Contract with you (as Our partner, sponsor or supplier) (b) Necessary for Our Legitimate Interests (We need this data to be able to contact you about becoming a partner,	6 years after the end of any contract (if any) or 6 years from the last correspondence about being a potential partner, sponsor or supplier

	(e) Marketing and Communications Data	<p>sponsor or supplier to allow you to become officially associated with Us or Our event(s).)</p> <p>(c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax purposes)</p>	
To enable you to be a medical professional including doctor, podiatrist and physiotherapist at one of Our events	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Marketing and Communications Data</p>	<p>(a) Performance of a Contract with you</p> <p>(b) Necessary for Our Legitimate Interests (We need this data to be able to allow you to provide your services at Our events, to ensure that you are adequately qualified and to ensure that We have the requisite number of medical professionals at Our events.)</p> <p>(c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax and insurance purposes)</p>	6 years from the date of the last event you assisted with
To enable you to be a Golden Bond, Silver Bond or other Charity contact or to apply to be part of Our charity ballots	<p>(a) Identity Data</p> <p>(b) Contact Data</p> <p>(c) Financial Data</p> <p>(d) Transaction Data</p> <p>(e) Marketing and Communications Data</p>	<p>(a) Performance of a Contract with you</p> <p>(b) Necessary for Our Legitimate Interests (We need this data to be able to provide you with the benefits of being a bond holder or charity contact and to ensure that you remain on the waiting list if you are on such list.)</p>	<p>6 years after the expiry of your Bond or last application to be an official charity; or</p> <p>For as long as those remain on the waiting list wish to remain there</p>
To enable you to attend one of Our events in any capacity that requires photographic accreditation (not otherwise dealt with in this table)	<p>(a) Identity Data</p> <p>(b) Contact Data</p>	<p>(a) Necessary to Comply with a Legal or Regulatory Obligation.</p> <p>(b) Performance of a Contract with you.</p> <p>(c) Necessary for Our Legitimate Interests (We</p>	6 years after the last time you were accredited

		need this for security reasons.)	
To enable you to apply to participate in Our events if you are under 13 years of age	(a) Identity Data (b) Contact Data	(a) Consent (parental consent either obtained by Us or via a third party) (b) Necessary for Our Legitimate Interests (to allow minors to participate in Our events - please see paragraph 4.12 below for more information)	5 years from last application to participate or until you reach the age of 13, whichever occurs sooner
To register you as a new customer (not otherwise dealt with in this table)	(a) Identity Data (b) Contact Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (to provide you with customer services)	3 years from last registration as a customer or last interaction with Us as a customer, whichever is later
To process and deliver your order including: (a) Manage payments, fees and charges; and (b) Collect and recover money owed to Us	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data (e) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (to recover debts due to Us) (c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax and consumer protection purposes)	6 years from order completion
To manage Our relationship with you which will include: (a) Notifying you about changes to Our terms or Privacy Policy; (b) Asking you to leave a review or take a survey; and (c) dealing with any complaints and responding to feedback	(a) Identity Data (b) Contact Data (c) Profile Data (d) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary to Comply with a Legal or Regulatory Obligation (c) Necessary for Our Legitimate Interests (to keep Our records updated and to study how customers use Our products/services)	6 years from last correspondence

To enable you to partake in a prize draw, competition or complete a survey	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (to study how customers use Our products/services, to develop them and grow Our business)	3 years from prize draw, competition or survey
To administer and protect Our business and the Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity Data (b) Contact Data (c) Technical Data	(a) Necessary for Our Legitimate Interests (for running Our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to Comply with a Legal or Regulatory Obligation	3 years from collection of data
To deliver relevant Site content and advertisements to you and measure or understand the effectiveness of the advertising We serve to you	(a) Identity Data (b) Contact Data (c) Profile Data (d) Usage Data (e) Marketing and Communications Data (f) Technical Data	Necessary for Our Legitimate Interests (to study how customers use Our products/services, to develop them, to grow Our business and to inform Our marketing strategy)	3 years from collection of data
To use data analytics to improve the Site and Our products/services, marketing, customer relationships and experiences	(a) Technical Data (b) Usage Data	Necessary for Our Legitimate Interests (to define types of customers for Our products and services, to keep the Site updated and relevant, to develop Our business and to inform Our marketing strategy)	3 years from collection of data
To make suggestions and recommendations to	(a) Identity Data	Necessary for Our Legitimate Interests (to	3 years from last unsuccessful ballot

you about goods or services that may be of interest to you (including where you have applied via the ballot for a place at one of Our events or where your image is captured by our official photographer at one of Our events)	(b) Contact Data (c) Technical Data (d) Usage Data (e) Profile Data	develop Our products/services and grow Our business and to provide you with the opportunity to purchase goods that commemorate your participation in one of Our events (such as an official photograph))	application or 3 years from last participation in one of Our events, whichever is later
For event logistics and operational purposes (including emergency service access routes, personal care plans, safety and security and public access routes)	(a) Identity Data (b) Contact Data	(a) Necessary for Our Legitimate Interests (for ensuring that the event logistics are in place and safety and security is maintained to ensure successful staging of Our events) (b) Necessary to Comply with a Legal or Regulatory Obligation (safety and security and insurance)	3 years from the event to which the data relates
To enable you to access and/or remain in Our premises or events or ensuring the safety of You and others with the aim of: (a) creating a safe environment (including observing protocols around limiting the number of visitors and staff within Our spaces, and other measures which have the aim of keeping people safe; (b) adhering to the most up-to-date government instructions and guidelines; and (c) maintaining and monitoring facilities for health and safety purposes	(a) Identity Data (b) Contact Data (c) Special Category Data	(a) Necessary to Comply with a Legal or Regulatory Obligation (b) Necessary for Our Legitimate Interests (to keep Our records updated and to keep people and premises safe)	For as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal requirements.
For The Trust to receive grant applications	(a) Identity Data	Necessary for Our Legitimate Interests (We need this data to analyse	5 years from last application

	(b) Contact Data (c) Transaction Data (d) Financial Data	the applicants (for example, by area and type of project), to assess applications and to track an applicant's record with Us since they may re-apply.)	
For The Trust to allocate grants	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a Contract with you (b) Necessary for Our Legitimate Interests (We need this data to ensure that each grantee continues to comply with the grant conditions and to analyse the applicants (for example, by area and type of project).) (c) Necessary to Comply with a Legal or Regulatory Obligation (charity laws and regulations concerning the grant)	In perpetuity
For The Trust to work with grant funders	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a Contract with you (as a grant funder) (b) Necessary for Our Legitimate Interests (We need this data to be able to work with you as a grant funder.) (c) Necessary to Comply with a Legal or Regulatory Obligation (including for tax purposes)	6 years after the end of any contract (if any) or 6 years from the last correspondence
To allow Us to become affiliated to selected membership organisations (such as London Funders, World Marathon Majors and the World Association of Cycling Events)	(a) Identity Data (b) Contact Data (c) Financial Data (d) Transaction Data	(a) Performance of a Contract with you (membership rules and regulations) (b) Necessary for Our Legitimate Interests (We need this data to be able to utilise the membership benefits.)	6 years after the affiliation terminates

4.5 AUTOMATED DECISION MAKING

We use your personal data to make the following automated decisions:

- 4.5.1 Event entries ballot: All applications for an entry to one of Our events received via one of Our ballots are processed electronically. Each application is uploaded to Our database, and Our database then automatically assigns a hidden, protected reference number;
- 4.5.2 Competitions: We may, from time to time, run competitions, where each participant's personal data is uploaded to Our database and a successful participant is automatically selected at random;
- 4.5.3 Selection procedures: Entry to Our events may be dependent upon times achieved at other events. In this case, each applicant's personal data is uploaded to Our database and a successful participant is selected by automated means;
- 4.5.4 Seeding: Start times or start positions at Our events may be dependent upon estimated finishing time. In this case, each participant's personal data is uploaded to Our database and a participant's starting place/group is selected by automated means.

4.6 MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

4.7 PROMOTIONAL OFFERS FROM US

- 4.7.1 We may use your Identity Data, Contact Data, Technical Data, Usage Data and Profile Data to form a view on what We think you may want or need, or what may be of interest to you. This is how We decide which products, services and offers may be relevant for you (We call this marketing).
- 4.7.2 You will receive marketing communications from Us if you have requested information from Us or purchased goods or services from Us or if you provided Us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

4.8 THIRD-PARTY MARKETING

We will get your express opt-in consent before We share your personal data with any company outside the London Marathon Group for marketing purposes.

4.9 OPTING OUT

- 4.9.1 You can ask Us or third parties to stop sending you marketing messages at any time by logging into the Site and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by Contacting Us at any time.
- 4.9.2 Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of product/service purchase, product/service experience or other transactions.

4.10 COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Site may become inaccessible or not function properly. For more information about the cookies We use, please see Our [Cookie Policy](#).

4.11 CHANGE OF PURPOSE

4.11.1 We will only use your personal data for the purposes for which We collected it, unless We reasonably consider that We need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [Contact Us](#).

4.11.2 If We need to use your personal data for an unrelated purpose, We will notify you and We will explain the legal basis which allows Us to do so.

4.11.3 Please note that We may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

4.12 CHILDREN'S DATA

4.12.1 We may collect and process the personal data of children below the age of 13 for the purposes of administering the following areas of our business, in which case we will always ensure that consent is given or authorised by the holder of parental responsibility over that child:

4.12.1.1 Events in which children may participate. We require the child's details in order for them to participate;

4.12.1.2 To televise, film and/or otherwise record Our events and to take photographs and record footage of Our events; and

4.12.1.3 To facilitate and publish the results of Our events.

5 DISCLOSURES OF YOUR PERSONAL DATA

5.1 We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4.4 above.

5.1.1 Internal third parties as set out in paragraph 10.2.1 below.

5.1.2 External third parties as set out in paragraph 10.2.2 below.

5.1.3 Specific third parties listed in the table in paragraph 4.4 above.

5.1.4 Third parties to whom We may choose to sell, transfer, or merge parts of Our business or Our assets. Alternatively, We may seek to acquire other businesses or merge with them. If a change happens to Our business, then the new owners may use your personal data in the same way as set out in this Privacy Policy.

5.2 We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow Our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with Our instructions.

6 INTERNATIONAL TRANSFERS

- 6.1 Many of Our external third parties are based outside the UK so their processing of your personal data will involve a transfer of data outside the UK. Such destinations may not have laws which protect your information to the same extent as in the UK.
- 6.2 Whenever We, or a third party to whom We transfer your personal data, transfers your personal data out of the UK, We ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- 6.2.1 your personal data is transferred to countries that are deemed to provide an adequate level of protection for personal data under UK data protection laws. For further details, see the section headed “*Is the restricted transfer covered by ‘adequacy regulations’?*” on *International transfers after the UK exit from the EU Implementation Period*;
- 6.2.2 where We use certain service providers: entering into specific contracts approved by the ICO, which give personal data the same protection it has in the UK. For further details, see appropriate safeguard no.6 under the section headed “*Is the restricted transfer covered by appropriate safeguards?*” on *International transfers after the UK exit from the EU Implementation Period*; or
- 6.2.3 use of either:
- 6.2.3.1. the international data transfer agreement; or
- 6.2.3.2. the international data transfer addendum to the European Commission’s standard contractual clauses for international data transfers,
- both issued by the ICO under section 119A(1) of the Data Protection Act 2018. For further details, see *International data transfer agreement and guidance*.
- 6.3 Please [Contact Us](#) if you want further information on the specific mechanism used by Us when transferring your personal data out of the UK.

7 DATA SECURITY

- 7.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, We limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on Our instructions and they are subject to a duty of confidentiality.
- 7.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where We are legally required to do so.

8 DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

- 8.1 We will only retain your personal data for as long as necessary to fulfil the purposes We collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 8.2 To determine the appropriate retention period for personal data, We consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which We process your personal data and whether We can achieve those purposes through other means, and the applicable legal requirements.

- 8.3 Details of retention periods for different aspects of your personal data are set out in the table in paragraph 4.4 above.
- 8.4 By law, We have to keep basic information about Our customers (including Contact Data, Identity Data, Financial Data and Transaction Data) for six years from the end of the company financial year in which they cease being customers, for tax purposes.
- 8.5 In some circumstances, you can ask Us to delete your data: see [Request erasure](#) below for further information.
- 8.6 In some circumstances, We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case We may use this information indefinitely without further notice to you.

9 YOUR LEGAL RIGHTS

- 9.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- 9.1.1 [Request access to your personal data.](#)
- 9.1.2 [Request correction of your personal data.](#)
- 9.1.3 [Request erasure of your personal data.](#)
- 9.1.4 [Object to processing of your personal data.](#)
- 9.1.5 [Request restriction of processing your personal data.](#)
- 9.1.6 [Request transfer of your personal data.](#)
- 9.1.7 [Right to withdraw consent.](#)

- 9.2 If you wish to exercise any of the rights set out in paragraph 9.1 above, please [Contact Us](#).

9.3 NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, We may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, We may refuse to comply with your request in these circumstances.

9.4 WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help Us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up Our response.

9.5 TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take Us longer than a month if your request is particularly complex or you have made a number of requests. In this case, We will notify you and keep you updated.

10 GLOSSARY

10.1 LAWFUL BASIS

- 10.1.1 **“Legitimate Interest”** means the interest of Our business in conducting and managing Our business to enable Us to give you the best service/product and the best and most secure experience. We make sure We consider and balance any potential impact on you (both positive and negative) and your rights before We process your personal data for Our Legitimate Interests. We do not use your personal data for activities where Our interests are overridden by the impact on you (unless We have your consent or are otherwise required or permitted to by law). You can obtain further information about how We assess Our Legitimate Interests against any potential impact on you in respect of specific activities by Contacting Us.
- 10.1.2 **“Performance of a Contract”** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 10.1.3 **“Comply with a Legal or Regulatory Obligation”** means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that We are subject to.

10.2 THIRD PARTIES

10.2.1 INTERNAL THIRD PARTIES

10.2.1.1 Other companies in the London Marathon Group from time to time, and which are based in the UK, including:

- 10.2.1.1.1 The Trust, whose main function is to award grants to inspire children and adults across the UK to be active. We may share personal data with The Trust for any purpose concerning:
- (A) the administration of the London Marathon Group (such reporting obligations and preparation of group accounts);
 - (B) the promotion of the work of The Trust and the London Marathon Group;
 - (C) dealings with sponsors and suppliers of Our events;
 - (D) dealings with participants in Our events; and
 - (E) the receipt by The Trust of grant applications, the allocations of grants and any work The Trust undertakes with grant funders. The Trust acts as a joint controller in this regard.

10.2.2 EXTERNAL THIRD PARTIES

10.2.2.1 Service providers acting as processors, who provide various services such as event entry, entry management and supporting services, grant management services, timing services, services with respect to the dissemination of photos, videos and other memorabilia, facilitation services for graphical representation of results, data analysis services, publication of race results services and IT and system administration services. Please Contact Us to find out more about the various third parties who may process your personal data.

- 10.2.2.2 Professional advisers acting as processors or joint controllers, including lawyers, bankers, auditors and insurers based in the UK who provide consultancy, banking, legal, insurance and accounting services.
- 10.2.2.3 HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the UK who require reporting of processing activities in certain circumstances.
- 10.2.2.4 Third party athletic bodies and affiliations such as:
 - 10.2.2.4.1 World Marathon Majors LLC, to allow them to:
 - (A) validate anyone is entitled to a Six Star Finisher status (or equivalent) or where runners are on the journey to such achievement; and
 - (B) operate the Age Group World Championships and Rankings;
 - 10.2.2.4.2 UK Athletics, for them to populate the Power of 10 ranking system.
- 10.2.2.5 Broadcasters, such as the BBC to allow them to commentate on Our events.
- 10.2.2.6 Where you have consented to pass your personal data to third parties (for example, hotel groups about accommodation in relation to Our events or charities where you have initially been unsuccessful in your event application).
- 10.2.2.7 Where you have provided consent to a third party to receive your information from LMEL (for example where you consent to such a transfer during the sign-up process for a fundraising page).
- 10.2.2.8 Media, where We deem that there is a human-interest story about your participation at one of Our events.

10.2.3 YOUR LEGAL RIGHTS

You have the right to:

- 10.2.3.1 **Request access** to your personal data (commonly known as a “**data subject access request**”). This enables you to receive a copy of the personal data We hold about you and to check that We are lawfully processing it.
- 10.2.3.2 **Request correction** of the personal data that We hold about you. This enables you to have any incomplete or inaccurate data We hold about you corrected, though We may need to verify the accuracy of the new data you provide to Us.
- 10.2.3.3 **Request erasure** of your personal data. This enables you to ask Us to delete or remove personal data where there is no good reason for Us continuing to process it. You also have the right to ask Us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where We may have processed your information unlawfully or where We are required to erase your personal data to comply with local law. Note, however, that We may not always be able to comply with your request of

erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- 10.2.3.4 **Object to processing** of your personal data where We are relying on a Legitimate Interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where We are processing your personal data for direct marketing purposes. In some cases, We may demonstrate that We have compelling legitimate grounds to process your information which override your rights and freedoms.
- 10.2.3.5 **Request restriction of processing** of your personal data. This enables you to ask Us to suspend the processing of your personal data in the following scenarios: (a) if you want Us to establish the data's accuracy; (b) where Our use of the data is unlawful but you do not want Us to erase it; (c) where you need Us to hold the data even if We no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to Our use of your data but We need to verify whether We have overriding legitimate grounds to use it.
- 10.2.3.6 **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for Us to use or where We used the information to perform a contract with you.
- 10.2.3.7 **Withdraw consent at any time** where We are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.