

CAYMAN ISLANDS NATIONAL COACHING ACADEMY*Building Champions On and Off the Pitch***DATA PROTECTION & CONFIDENTIALITY POLICY**

Standalone Policy · 2026 Edition

Protecting the personal data entrusted to us

Policy title	Data Protection & Confidentiality Policy
Owner	Academy Director, Cayman Islands National Coaching Academy
Applies to	All personal data that the Academy collects, holds, or processes
Edition	2026
Review cycle	Annual, or earlier if law or practice changes
Related documents	Privacy Policy; Safeguarding & Child Protection Policy; Photography & Media Policy; Instructor NDA

Our commitment

The Cayman Islands National Coaching Academy treats the personal data of participants, coaches, parents, staff, and partners with care, holding it securely, using it only for clear and lawful purposes, and respecting every individual's data-protection rights.

DATA PROTECTION & CONFIDENTIALITY POLICY**1. Purpose**

This policy sets out how the Cayman Islands National Coaching Academy (CINCA) collects, uses, stores, shares, and protects personal data and how it keeps confidential information secure. It explains the rights of the people whose data the Academy holds and the responsibilities of everyone who handles that data on the Academy's behalf.

2. Policy Statement

The Academy is committed to protecting the privacy and personal data of all individuals it works with. We will:

- process personal data lawfully, fairly, and transparently;

- collect only the data we need, for clearly defined purposes;
- keep data accurate, secure, and no longer than necessary;
- respect the rights of data subjects; and
- hold confidential information in strict confidence.

3. Scope

This policy applies to all personal data processed by the Academy, on paper, electronically, online, or through digital and mobile platforms, and to everyone who processes that data on the Academy's behalf, including the Academy Director, staff, coaches, instructors, contractors, and volunteers. It covers data about participants and coaches in training, parents and guardians, employees and volunteers, and partner and sponsor contacts.

4. Legal Framework

The Academy processes personal data in accordance with:

- the Data Protection Act of the Cayman Islands and its Regulations, overseen by the Office of the Ombudsman;
- the privacy and non-discrimination protections of the Cayman Islands Constitution (Bill of Rights); and
- recognised information security and safeguarding good practice.

Where the law is updated, this policy is read consistently with the current requirements.

5. Definitions

Personal data: Any information relating to an identified or identifiable living individual (a “data subject”) — for example, a name, address, email, photograph, or identification number.

Sensitive (special category) data: Personal data of a more sensitive nature, such as health, medical, racial or ethnic, or biometric data, which requires greater protection.

Processing: Any operation performed on personal data, including collecting, recording, storing, using, sharing, or deleting it.

Data controller: The Academy, which determines how and why personal data is processed.

Data processor: A third party that processes personal data on the Academy's behalf (for example, an IT or payment provider).

Consent: A freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of their data.

6. Data-Protection Principles

The Academy applies the data-protection principles set out in the Data Protection Act:

Principle	What it means for the Academy
1. Fair & lawful	Personal data is processed fairly and lawfully, with a valid basis.

2. Purpose limitation	Data is obtained only for specified, lawful purposes and not used in incompatible ways.
3. Data minimisation	Data is adequate, relevant, and not excessive for the purpose.
4. Accuracy	Data is accurate and, where necessary, kept up to date.
5. Storage limitation	Data is not kept for longer than necessary.
6. Rights of data subjects	Data is processed in line with data subjects' rights.
7. Security	Appropriate technical and organisational measures protect the data.
8. International transfers	Data is not transferred outside the Cayman Islands without adequate protection.

7. Personal Data the Academy Collects

Category	Examples	Main purpose
Identity & contact	Name, date of birth, address, email, phone	Registration & communication
Participant/coaching	Coaching experience, qualifications, and age group	Programme delivery & certification
Health & medical	Conditions, allergies, medication, emergency contacts	Safety & duty of care
Parent/guardian	Names and contact details (for under-18s)	Consent & safeguarding
Financial	Payment and refund details	Fees & refunds (CI\$)
Images & media	Photographs and video	Promotion & education (with consent)
Feedback	Evaluations and survey responses	Quality improvement

8. Lawful Basis for Processing

The Academy processes personal data only where it has a lawful basis to do so typically the consent of the data subject (or parent/guardian for a child); the performance of a contract or service the person has requested; compliance with a legal obligation; protection of someone's vital interests (for example in a medical emergency); or the Academy's legitimate interests in running its programmes, balanced against the rights of the individual.

9. Children's Data and Safeguarding

Where a participant is under 18, the Academy obtains consent from a parent or guardian and applies additional care to the child's data. Information relating to a child's safety or welfare is handled under the Safeguarding & Child Protection Policy and shared with the Safeguarding Officer or relevant authorities where required to protect the child.

10. How the Academy Uses Personal Data

The Academy uses personal data to administer registrations and programmes, deliver coaching and certification, ensure participant safety and welfare, process fees and refunds, communicate with participants, parents, and partners, gather feedback and improve its programmes, and meet its legal and accreditation obligations.

11. Sharing and Disclosure

The Academy does not sell personal data. It shares data only where necessary and lawful, for example, with:

- trusted service providers (such as IT, payment, or venue providers) acting on the Academy's instructions;
- relevant federations or partners where needed for accreditation or participation, with appropriate consent;
- public authorities where required by law or to protect a person's safety; and
- professional advisers under a duty of confidentiality.

Where a third party processes data on the Academy's behalf, a written agreement requires them to protect the data and use it only as instructed.

12. International Transfers

Where personal data is transferred outside the Cayman Islands (for example, to an overseas cloud or software provider), the Academy takes steps to ensure the data continues to receive an adequate level of protection, consistent with the Data Protection Act.

13. Data Security

The Academy applies appropriate technical and organisational measures to keep personal data secure, including:

- restricting access to those who need it (least-privilege access) and using passwords and, where appropriate, encryption;
- storing paper records securely and locking away sensitive documents;
- using reputable, secure systems and keeping software up to date;
- training staff, coaches, and volunteers in their data-protection responsibilities; and
- securely deleting or destroying data when it is no longer needed.

14. Retention

The Academy keeps personal data only as long as necessary for the purpose it was collected, or as required by law. Indicative retention periods:

Record type	Indicative retention
Registration & participation records	Duration of engagement + up to 7 years
Health & medical information	Until no longer needed for the programme, then securely destroyed
Financial & payment records	As required by law (typically up to 7 years)
Safeguarding records	Retained in line with the Safeguarding Policy

Images & media (with consent)	Until consent is withdrawn or no longer needed
Evaluation & feedback	Anonymised or destroyed once analysis is complete

15. Rights of Data Subjects

Under the Data Protection Act, individuals have rights over their personal data. The Academy will help people exercise these rights:

Right	What it means
Be informed	To know how their data is used (through this policy and the Privacy Policy).
Access	To request a copy of the personal data the Academy holds about them.
Rectification	To have inaccurate or incomplete data corrected.
Erasure/blocking	To have data deleted or blocked where there is no lawful reason to keep it.
Stop or restrict processing	To object to or limit certain processing, including direct marketing.
Automated decisions	Not to be subject to significant decisions made solely by automated means.
Complain	To complain to the Academy and to the Office of the Ombudsman.

16. Making a Request

To exercise any of these rights, a person may contact the Academy's administration office using the details in Appendix D (Key Contacts) of the CINCA Policy Manual. The Academy will respond without undue delay and within the timeframe required by law, and will not charge a fee except where permitted.

17. Personal Data Breach Management

A personal data breach is the accidental or unlawful loss, destruction, alteration, or unauthorised disclosure of, or access to, personal data. Anyone who becomes aware of a suspected breach must report it immediately to the Academy Director.

Breach notification

Where a breach is likely to cause harm, the Academy will notify the Office of the Ombudsman and the affected individuals without undue delay and, in any event, within five (5) days of becoming aware of the breach and will record the breach, its effects, and the action taken.

18. Confidentiality Obligations

Everyone acting for the Academy must keep personal data and confidential information in strict confidence, use it only for legitimate Academy purposes, and not disclose it without authority. Instructors and contractors sign a Non-Disclosure & Confidentiality Agreement. Confidentiality obligations continue after a person's engagement with the Academy ends.

19. Photography, Video, and Media

The Academy captures and uses images only with appropriate consent, in line with its Photography & Media Policy. Consent can be withdrawn at any time, and the Academy takes reasonable steps to stop further use of an image once consent is withdrawn.

20. Roles and Responsibilities

Who	Responsibilities
Academy Director	Overall accountability for data protection ensures this policy is resourced, followed, and reviewed, handles breaches and requests or delegates them.
Staff, coaches & volunteers	Handle personal data securely and only as needed, complete data-protection awareness, and report breaches immediately.
Instructors & contractors	Comply with this policy and their Non-Disclosure Agreement; return or destroy data when asked.
All persons	Respect confidentiality; do not share personal data without authority.

21. Concerns and Complaints

Anyone with a concern about how the Academy handles personal data may raise it with the Academy Director or through the Complaints & Grievance Procedure. Individuals also have the right to complain to the Office of the Ombudsman (Cayman Islands).

22. Related Policies

This policy should be read together with the Privacy Policy, the Safeguarding & Child Protection Policy, the Photography & Media Policy, the Social Media & Digital Communication Policy, and the Instructor Non-Disclosure & Confidentiality Agreement.

23. Review

This policy is reviewed at least annually by the Academy Director or sooner, where law, guidance, or experience indicates that change is needed.

Document control	Detail
Policy title	Data Protection & Confidentiality Policy
Owner	Academy Director, Cayman Islands National Coaching Academy
Edition	2026
Review cycle	Annual, or earlier if required
Supervisory authority	Office of the Ombudsman (Cayman Islands)

