

# **Draft Data Privacy Policy**

## 1. About this Policy

1.1 This policy explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.

1.2 We may collect, use and store your personal data, as described in this Data Privacy Policy and as described when we collect data from you.

1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website (www.chelseakayakclub.co.uk) for any amendments (such amendments will not apply retrospectively).

1.4 We will always comply with applicable UK Data Protection legislation including General Data Protection Regulation (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk). For the purposes of the GDPR, we will be the "controller" of all personal data we hold about you.

### 2. Who are we?

2.1 We are Chelsea Kayak Club. We can be contacted at info@chelseakayakclub.co.uk.

#### 3. What information we collect and why.

Type of Information	Purposes	Legal Basis of Processing
Members' name, address, telephone numbers,	Managing the membership for the member.	Performance of the club's contract with the
email addresses		member. Our legitimate interests in operating the club.
Name and Date of Birth	Managing member membership and for affiliating to British Canoeing	Performance of the club's contract with the member.
Emergency Contact Details	Contacting next of kin in event of emergency	Our legitimate interests in meeting our duty of care to members
Medical Conditions	To run safe trips and to provide accurate information in case of an emergency	Our legitimate interests in meeting our duty of care to members
British Canoeing, first aid and other qualifications	To run safe and appropriate trips	Our legitimate interests in meeting our duty of care to members. Our legitimate interests in operating the club.
Area of interest, and roles within the club	To enable members to participate in efficiently running their club.	Our legitimate interests in operating the club.
Phone number on trip sign up form	To enable communication between club members in case trip plans change	Our legitimate interests in operating the club.
Date of Birth on Guest sign-in form	To gather information BC needs in order for club trips to covered by insurance on trips	Our legitimate interests in operating the club.

### 4. How we protect your personal data

4.1 We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.2 Please note, however, that where you are transmitting information to us over the internet, then given the internet is not a secure medium, we cannot definitely guarantee the security of this information.

4.3 For any payments which we take from you online we will use a recognised online secure payment system.

4.4 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

## 5. Who else has access to the information you provide us?

5.1 We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law or as set out in the table in paragraph 3 above or paragraph 5.2 and 5.3 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to automate club membership registrations, or be insured). However, we disclose only the personal data that is necessary for the third party to deliver the service.

5.3 We may pass on data, that you consent to being shared, with other CKC members.

## 6. Sharing with British Canoeing

6.1 We may share your details with British Canoeing if you are not already a British Canoeing member. This is to provide insurance for your club activities. If this is the case British Canoeing will provide you with access to an online portal to administer your details.

6.2 British Canoeing will contact you to invite you to sign into and update your Go Membership portal. Among other things, the portal allows you to set and amend your privacy settings, and also sign up to the member newsletter if desired. You can delete your account at any time and you will not receive communications unless you request them.

6.3 If you have any questions about the continuing privacy of your personal data when it is shared with British Canoeing, please contact membership@ britishcanoeing.org.uk.

### 7. How long do we keep your information?

7.1 We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data with the exception of retaining your personal data in an archived form in order to be able to comply with future legal obligations, including but not limited to compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

### 7. Your rights

- 7.1 You have rights under UK and EU data protection law, including:
  - a. to access your personal data

- b. to be provided with information about how your personal data is processed
- c. to have your personal data corrected
- d. to have your personal data erased in certain circumstances
- e. to object to or restrict how your personal data is processed

f. to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 If you wish for us to erase your data as outlined in paragraph (3) above then please contact us at info@chelseakayakclub.co.uk

7.3 If you have any concerns about how we process your personal data please contact us at info@chelseakayakclub.co.uk

7.4 You also have the right to take any complaint about how we process your personal data to the Information Commissioner:

https://ico.org.uk/concerns/ 0303 123 1113.

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer (Please see CKC website for the current Data Protection Officer).