

Devizes Canoe Club Data Protection Policy

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1. Aim

- 1.0 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.
- 1.1 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.
- 1.2 We reserve the right to amend this Data Privacy Policy from time to time without prior notice. You are advised to check our website (<https://devizescanoeclub.co.uk/club-documents/>) regularly for any amendments (such amendments will not apply retrospectively).
- 1.3 We will always comply with applicable UK Data Protection legislation including 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 we are

- 2.1 We are Devizes Canoe Club. We can be contacted at

Devizes Canoe Club
Lower Wharf
Devizes
Wiltshire
SN10 1JP

By email: info@devizescanoeclub.co.uk

By phone: 07907 784876

3. What information we collect and why

Type of Information	Purposes	Legal Basis of Processing
Members' name, address, telephone numbers, email addresses, date of birth	Managing the membership for the member.	Performance of the club's contract with the member. Performance of the club's affiliation obligations to our National Governing Body (Paddle UK) Our legitimate interests in operating the club.
Name and age of junior members under the age of	Managing member and dependents' membership	Performance of the club's contract with the member.

18 years		
Emergency Contact Details	Contacting next of kin in event of emergency	Our legitimate interests in meeting our duty of care to members
Details about medical conditions	To ensure member safety in the event of a medical emergency	Our legitimate interests in meeting our duty of care to members
Details required by the Disclosure and Barring Service	To help the club make safer decisions when recruiting coaches and volunteers.	Our legitimate interests in meeting our duty of care to members

4. How we protect your personal data

- 4.1 Membership data you provide us is stored on the Paddle UK/British Canoeing secure JustGo Membership portal.
- 4.2 We will not transfer your personal data outside the European Economic Area without your consent.
- 4.3 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.
- 4.4 Please note, however, that where you are transmitting information to us over the internet, then given the internet is not a secure medium or within our direct control, we cannot guarantee the security of this information.
- 4.5 Any payments which we take from you online will use a recognised online secure payment system.
- 4.6 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

5. Club Officials with access to your data

- 5.1 Club officials need access to the membership data you chose to provide to perform essential duties necessary to manage and administer the club effectively. The legal basis for this access is to enable the effective governance of club affairs and we provide your membership on the basis that you agree your data will be shared for this purpose.
- 5.2 We have approved the following club officials as Online Administrators on the Paddle UK JustGo Membership database:

Appointment	Purpose for online data access
Club Chair of Trustees	General communication to club members
Club Committee Chair	Member contact in connection with operational management and new memberships
Club Secretary	To maintain membership records and for general membership correspondence

- 5.3 Other club officials have legitimate access to datasets created from membership and/or health data provided by members. As members, you consent to these officials contacting in connection with these specific reasons:

Appointment	Purpose for processing data
Coaching team	Specific individual health data you chose to share for safety reasons.
Boat Storage Officer	Contact details for private boat owners using club storage.
Race Officer	Contact details and BC numbers for management of club race entries.

Volunteer Coordinator	Contact and training details for the volunteer workforce
Welfare Officer/DBS Coordinator	Contact and DBS certificate details for volunteers requiring DBS clearance to work with children and vulnerable adults

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

- 6.1 As a Paddle England affiliated club we are required to upload membership data you provide to the secure JustGo Membership portal, whether or not you are an individual member of Paddle UK.
- 6.2 Should you request that we do not share your data with Paddle UK you will not have the benefits of associate membership including insurance when taking part in club activity or the ability to enter Paddle UK participation events.
- 6.3 We will never sell your personal data. We will not share your personal data with any other 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 5.4 below.
- 6.4 We may share your personal data to third parties for the purposes of completing tasks and providing services to you on our behalf (e.g. distribution of newsletters and send you electronic mailings about club events). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

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.
- 7.2 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 except for retaining your personal data in an archived form (for clarity this means it will not be on the JustGo Membership database or available to anyone other than the Club Secretary) 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.
- 7.3 We securely destroy all financial information once we have used it and no longer need it.

8. Data Protection and Images

- 8.1 Personal information, as defined under GDPR, also includes photographs and images of people. This is because of the facial recognition software.
- 8.2 The club is obliged to seek consent to store and use images in the same way we do for contact details and other personal information. With respect to imagery, we protect your rights in the following ways:
- a. You have the right to be informed about how your photos are being used, and we will only use them for the purposes outlined as part of the opt-in.
 - b. You have the right to access your personal photos on request, and receive confirmation regarding how these are being used.
 - c. You have the right to be forgotten. You may request photos of you or your family be removed from our websites, social media or future versions of printed materials.

- d. We will seek parental consent to use any photos featuring children under the age of 18. We will do so via an opt-in on the membership or events sign up forms.

9. Your rights

9.1 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.

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

9.3 If you have any concerns about how we process your personal data please contact us at secretary@devizescanoeclub.co.uk.

9.4 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

10. Data Controller

9.1 For more details, please address any questions, comments and requests regarding our data processing practices to our Data Protection Officer, who is the Club Secretary (secretary@devizescanoeclub.co.uk).