# **Halifax Canoe Club 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. It also explains 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, and without prior notice. You are advised to check our website <a href="www.halifaxcanoe.org.uk/club-policies/">www.halifaxcanoe.org.uk/club-policies/</a> for any amendments. The policy is reviewed at least annually. Any amendments will not apply retrospectively.
- 1.4 We will always comply with applicable UK Data Protection legislation, including General Data Protection Regulations (GDPR) when dealing with your personal data. Further details on the GDPR can be found at the website for the Information Commissioner <a href="www.ico.gov.uk">www.ico.gov.uk</a>. 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 Halifax Canoe Club Ltd. We can be contacted at Greenups Mill, Wharf Street, Sowerby Bridge, HX6 2AQ. <a href="mailto:secretary@halifaxcanoe.org.uk">secretary@halifaxcanoe.org.uk</a>

# 3. What information we collect and why:

Type of Information	Purposes	Legal Basis of Processing
Members' name, date of birth,	Managing the membership for	Our legitimate interests in
address, telephone numbers,	the member.	operating the club.
email addresses		
Name, address, telephone	Managing the Family	Our legitimate interests in
numbers, email address, date	Membership option	operating the club.
of birth of linked family		
member(s)		
Name, address, telephone	To manage the Junior	Our legitimate interests in
number and email of	Membership option	operating the club.
parents/guardians who are not		
club members		To maintain our duty of care to
		Junior club members.
Email addresses (specifically)	To communicate relevant	Our legitimate interests in
	information to members (and	operating the club.
	parents/guardians, where	
	appropriate)	To ensure that all members
		are informed, updated, and
		aware of information that is
		relevant to them.
British Canoeing membership	Managing the membership of	To ensure correct billing of
status	the member and to manage	members and to maintain
	coaching records (where	accurate British Canoeing
	appropriate)	affiliation records.

Emergency Contact Details	Contacting next of kin in the event of emergency	To maintain our duty of care to members during club activities.
Medical Information	To maintain your safety in the event of an emergency	To maintain our duty of care to members during club activities.
Records of your attendance at club courses, trips, events etc.	To conduct data analytics studies to better understand attendance.  To comply with health and safety requirements	To ensure that our courses are targeted and relevant. To meet our obligations to various grant award bodies. To comply with our legal obligation to meet health and safety requirements
Retention of records of current and former members	This includes:  • Data from previous membership periods of current members  • Data from former members who have left the club	We have a legitimate interest in retaining records to administer and manage your membership and run our club. In some cases, we may have legal or regulatory obligations to retain records.
	<ul> <li>Historic attendance records</li> <li>Accident &amp; Incident reports</li> </ul>	We delete former member medical information unless there is an explicit reason to maintain it. e.g. ongoing insurance claims, or complaints  Criminal records (DBS) history checks are processed within our legal obligations or based on your explicit consent.
	*These are examples. The list is not exhaustive	
Images in photographic and/or video-graphic form	For the purposes of promoting club activities, events and opportunities.	Where you have given your explicit consent to do so.
Event booking records	To manage events, such as river trips, courses, social events and meetings.  To maintain historic attendance records.	To maintain our duty of care to members during club activities  To assist in future planning of events  To assist with any insurance
		To assist with any insuranc claims

#### 4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the European Economic Area without your consent.
- 4.2 Any online payments that we take from you will be made using a recognised and secure payment method.
- 4.3 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 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 provide courses). However, we will only provide them with the personal data that is necessary to deliver the service. We will have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

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

- 6.1 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 to defend legal claims.
- 6.2 We securely destroy all financial and medical information once we have used it and no longer need it.

## 7. Your rights

- 7.1 You have rights under UK and EU data protection law, including:
  - 1. The right to be informed
  - 2. The right of access
  - 3. The right to rectification
  - 4. The right to erasure
  - 5. The right to restrict processing

- 6. The right to data portability
- 7. The right to object
- 8. Rights in relation to automated decision making and profiling.
- 7.2 If you would like us to erase your data please contact us at secretary@halifaxcanoe.org.uk
- 7.3 If you have any concerns about how we process your personal data please contact us at secretary@halifaxcanoe.org.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

If you would like more details, please send any questions, comments and requests regarding our data processing practices to our Data Protection Officer, Stuart Vidler, <a href="mailto:secretary@halifaxcanoe.org.uk">secretary@halifaxcanoe.org.uk</a>