

Chippenham Sailing and Canoeing Club Data Privacy Notice v1.2

Who we are

1. The Chippenham Sailing and Canoeing Club is run by our members for our members. Our aims are to introduce people of all ages to sailing, canoeing and kayaking and enable our members to practise safe and enjoyable watersports on our home waters of the River Avon at Chippenham and elsewhere. To further these aims, we hold personal data about members and others who take part in club activities.

What this Notice is about

2. This notice sets out what personal data we hold about you, and why we need to hold it. It sets out how we look after your data, who can see it and what your rights are in connection with it. CSCC is both a “controller” and a “processor” of your data.
3. This privacy policy has been updated to take into account the General Data Protection Regulations 2018 (GDPR) which come into force on 25 May 2018. In updating this policy, we have followed guidance from the Information Commissioners Office as well as data protection advice from our parent organisations British Canoeing (BC) and the Royal Yacht Association (RYA).

The data we hold about you

4. When you apply to become a member of CSCC, the information we gather about you identifies you as an individual and is classified as personal data under data protection law. This information includes your name, home address and contact details such as phone number and/or email address. We ask you to declare which age group you fall within at the time of application. If you are under 18, we also ask you for your date of birth and a parent’s or guardian’s name and contact details. If you are 18 or over, you may give us your date of birth if you wish.
5. We will record your membership number of British Canoeing or RYA if you declare that to us in your application.
6. When you apply to take part in one of our courses or taster session, whether you are a member or not, or to take part in a club trip, we ask you for your name, contact details and date of birth (if you are under 18), as well as emergency contact details. We also ask you to tell us about any medical condition you have which may affect your participation. You may instead tell the coach directly on the day that your course or trip begins. You do not have to give us any medical information if you do not want to.
7. When you store boats or other equipment on the club site, we hold data about the equipment you store together with your name, address and email address (if you have given us this).

8. We record when and how much you paid for membership, storage, course or other fees but do not hold any other financial data from you.
9. When you attend a taster session and/or are inducted into the club, we record your induction, who inducted you, the date, and your acknowledgement of the club rules.
10. We will record the types of club activity that you have told us you are interested in, as well as your choice of contact method (including none) for general club news. You may also subscribe to our general subscription service provided by MailChimp. In this case, MailChimp is acting as data processor on our behalf and will record the personal data you give it. If you subscribe through MailChimp, you should make yourself aware of MailChimp's privacy policy: <https://mailchimp.com/legal/privacy> .
11. Other occasions in which we may record data that can identify you as an individual are when you ask us to enter you for club or other organisations' events, for assessment or other award purposes, for recording any safety-related incidents which take place during club activities, or for disciplinary reasons. In these cases we may record your name, contact details and if you are under 18, your date of birth and parent's or guardian's contact details.
12. If you volunteer for the club as a coach or committee member, we record your name and contact details as well as details about your volunteering work. We will record details of any qualifications or prerequisites you tell us about, or ask us to apply for on your behalf, relevant to your volunteering work. We will record any declaration of interests you make.
13. When you send a query to one of the club committee or through the website we will keep a record of correspondence, which may include personal information you provide.
14. We may record names and email addresses of people who sign up at public events for information or taster sessions.

Why we need your personal information (our legal bases for holding your data)

15. Contractual basis – we need to collect your personal information in order to manage your membership and provide you with our core member services, including giving you access to the club site, equipment and storage, notifying you about general meetings, and establishing your entitlement to and providing you with member benefits such as courses, club trips and events.
16. Vital interest – If you tell us about any health-related issue (special category data) which may affect your participation in a specific course or trip, we use it to enable you and others to participate safely in that club activity.

17. Legitimate interests – we need to collect your personal information to:

- a. Encourage participation in club activities and our sports by providing you with information about planned events including courses, skill award assessments, races, trips, award evenings, social nights – based on your declared interests – and coordinating your attendance at these;
- b. Govern and manage the club through maintaining a network of qualified volunteers including coaches and committee members;
- c. Encourage individual development by assessing your skills against awarding body criteria when you ask a CSCC qualified assessor to and by notifying that governing body when you are successful;
- d. Monitor and develop paddlesport and sailing by monitoring member engagement and participation by age grouping;
- e. Amalgamate personal information into statistical data to meet the requirements of insurers and governing and funding bodies;
- f. Promote the club and our sports by contacting and running public taster sessions for non-members who sign up for these at public events or online;
- g. Promote the club by entering into any other correspondence with you in response to general contact that you make.

18. Consent – to promote the club we may ask you if we can use any photos or videos in publicity material and/or social media. We will only do so if you agree. We will ask you from time to time to renew this consent. You may withdraw that consent at any time by contacting the Membership Secretary or Commodore.

Who can see your data

19. Any health-related information (special category data) you give us in a course application is accessible only to the course coordinator and your course coach or trip leader. Membership records and public participation records are accessible to the Commodore, the Membership Secretary and other committee members or club volunteers as appropriate. Storage records are accessible to the Membership Secretary and Equipment Officer. Email addresses are accessible to the IT coordinator and other committee members as appropriate.

20. When office holders change, for example at the Annual General Meeting, the old office holder will pass paper and electronic records to the new office holder. The Commodore is responsible for ensuring that each new office holder is made aware of their new obligations to protect your data and for arranging any training that might be needed.

Sharing with other organisations

21. CSCC uses third party suppliers to provide services such as IT storage and email subscription services. These suppliers process your personal information on our behalf and are subject to agreements between the club and the supplier to the effect that this processing is subject to and complies with EU data protection law.

22. CSCC is affiliated to British Canoeing (BC) and to the Royal Yacht Association (RYA). If you are successful in an award or qualification assessed by CSCC we will share your personal information with the awarding body in order to process your qualification. We share aggregated information with them about our membership numbers – these do not identify you as an individual. From time to time we share similar aggregated information with grant-awarding organisations such as Sport England.
23. When you ask us to enter you for events such as a race run by a third party, we will ask you for the registration information the third party needs before passing it to them. You should check their data privacy policy before providing us with this information and agreeing for us to share it with them. We will use the most secure method we can to transfer your personal data but we are not responsible for it once it has been passed to the third party.
24. We may be required to share personal information with statutory or regulatory authorities and organisations, for example with Wiltshire Police for safeguarding purposes.
25. We may also share personal information with our professional and legal advisers so they can give us advice.

How we look after your personal data

26. We store membership and boat storage records in both paper and electronic form. Electronic information is stored in password-protected files within storage where permissions have been restricted to authorised individuals. We may use online storage for this. Membership records are stored in DropBox; you can see DropBox's privacy policy here: <https://www.dropbox.com/privacy2018>.
27. When we need to send an electronic file containing your personal data to someone else within the club, for example if the course coordinator needs to send information to a CSCC coach, we exchange the file and its password using different methods.
28. Where we can, we protect stored and exchanged data with methods such as two factor authentication and encryption.
29. Paper records are held in physically secure storage off the club site.

How long we hold this data for

30. Health-related special category information is destroyed immediately after the event for which you have declared it.
31. Our policy is to retain some types of data for six (6) years, or for three (3) years after the point when you have reached the age of 18 if that is longer, to make sure the club can deal with any insurance claims which may arise. These data are:

- a. a subset of your membership record, enough to identify you as a member and the membership year in which you were a member,
 - b. records of participation in courses or taster sessions by non-members, and
 - c. incident reports.
32. Disciplinary records, or records of other circumstances such as cases of Safeguarding, may be held indefinitely.
33. Other data are destroyed no more than 12 months after the membership year in which they were created. The CSCC membership year runs from 1 April to 31 March.
34. While this is now our data retention policy (May 2018), we cannot guarantee that we hold records which predate the current membership year (2018-19).

Your rights

35. You have a right to see a copy of data we hold about you. You can make a request to do so (called a subject access request) by asking the Commodore for this information. We must give you this information within 30 days of your request. There is no charge to make a subject access request.
36. There are some circumstances in which we might not disclose to you all of the data we hold about you, for example if doing so would infringe someone else's right to privacy or prejudice a criminal investigation. We will consider each request on a case by case basis and document any reasons for not disclosing any information. The Commodore will consult with the CSCC Data Protection Officer and seek legal advice as necessary before withholding any part of data requested under a subject access request.
37. You have the right to have any of your personal data corrected or completed if you believe it is inaccurate or incomplete.
38. You have the right to ask us to restrict our processing of your data where we are doing this in pursuit of our legitimate interests (see para 17 above).
39. You have the right to request that we delete your personal data. The Commodore will consult with the CSCC Data Protection Officer and seek advice as necessary before confirming whether your request can be met.

The CSCC Data Protection Officer can be contacted here:
dataprotection@chippenham-scc.com