

Broxbourne Rowing Club
PRIVACY NOTICE

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club or to use any of our services or facilities. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information.

References to **we, our, us** or **club** in this privacy notice are to Broxbourne Rowing Club Limited. The club is a company limited by guarantee and registered in England under No 12322612 with its registered office at The Clubhouse, Old Nazeing Road, Broxbourne EN10 6QU. The club is also a charity registered under No 1188068.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Data Protection group has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU

Depending on the type of membership you register for with us, you may initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, email addresses, address and telephone numbers;
- date of birth;
- gender;
- emergency contact details (name and telephone numbers);
- for juniors school name and junior email address;
- data relevant to your club membership, such as membership category, squad, volunteering preference, private boat details, membership start and end date
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us, including about joining the club or hiring;
- any payment details you provide so that we can receive and track payments from you and details of the financial transactions with you;
- CCTV footage;
- images in video and/or photographic form and voice recordings;
- any complaints, grievances and disciplinary information and subsequent reports or actions; and
- records and assessment of any training, including ergos and competition results.

2. SPECIAL CATEGORIES OF PERSONAL INFORMATION

We may also collect, store and use the following "**special categories**" of more sensitive personal information regarding you:

- information about your health and additional requirements that you declare, including any medical condition or additional needs, symptoms and action to be taken;
- references from your Volunteer form; and
- notes or reports regarding investigations into grievances or complaints or welfare cases.

We may not collect all of the above types of special category personal information about you. In relation to the special category personal data that we do process we do so on the basis that

- the processing is necessary for reasons of substantial public interest, on a lawful basis;
- it is necessary for the establishment, exercise or defence of legal claims;
- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law; or
- based on your explicit consent.

In the table below we refer to these as the “special category reasons for processing of your personal data”.

We may also collect criminal records information about you. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

3. WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you apply to become a member of the club, when you purchase any services or products we offer (e.g. hire the club or join a learn to row course), when you make a query and/or complaint or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from any third party references you provide as part of your volunteer application, if applicable.

If you are providing us with details of referees and emergency contacts they have a right to know and to be aware of how what personal information we hold about them, how we collect it and how we use and may share that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
To administer any membership you have with us and managing our relationship with you, including dealing with payments and any support, service or product enquiries made by you	All contact and membership details, transaction and payment information and records of your interactions with us.	This is necessary to enable us to properly manage and administer your membership contract with us and to enable us to disseminate information about the running of the club, including any advice about health and safety. Please note that it is not possible to opt out of receiving club communications, as it not practical for us to separate communications relating to club news, membership processing and safety information.
To arrange and manage any contracts for the provision of any services or products	Contact details, transaction and payment information. Records of your interactions with us.	This is necessary to enable us to properly administer and perform any contract for the provision of any services and products you have purchased from us. (Note that the purchase of club kit is a private transaction between yourself and the supplier of club kit).
To answer your queries or complaints	Contact details and records of your interactions with us	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints or claims. We need to retain records in order to properly administer and manage your membership and run our club and in some cases we may have legal or

		<p>regulatory obligations to retain records.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.</p> <p>For criminal records history we process it on the basis of legal obligations or based on your explicit consent.</p>
The security of our IT systems	Your usage of our IT systems and online portals.	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies to better understand our membership and event attendance and trends	Contact and membership details and records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the club, our events and membership packages.	Images in video and/or photographic form.	Where you (or in the case of juniors – their parents or guardians) have given us your explicit consent to do so on the Membership Declaration.
To use information about your physical or mental health or additional needs (including any injuries) or disability status, to ensure your and others health and safety and to assess your fitness to participate in any activities and to provide appropriate adjustments to our sports facilities and to provide support in case of incident.	Medical and additional needs information about your health	<p>We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.</p> <p>We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. We will not seek your explicit consent to hold such data that you declare, as we have a legitimate interest. This is because it is conducive for your and others safe participation in the club activities that medical conditions be declared and retained when applying to join the club and during your membership of the club. If this information was not available this may endanger other people’s safe participation in the sport as well as your own</p>
To comply with health and safety and security requirements	Records of attendance and CCTV footage and other information obtained through electronic means	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport. Close Circuit Television (CCTV) footage maybe recorded on the club site and stored, this is to support safety and security. This maybe shared with third parties such as the Police in case of incident.
To administer your attendance at any courses or programmes you	All contact and membership details, transaction and payment	This is necessary to enable us to register you on to and properly manage and administer your attendance on the course and/or

sign up to	data.	programme.
To arrange for any trip or transportation to and from an event or training camp	Identification documents details of next of kin, family members and emergency contacts, transaction and payment information, health and medical information.	This is necessary to enable us to make the necessary arrangements for the trip and/or transportation to an event. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above
To gather evidence for possible grievance or disciplinary hearings including welfare cases	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any disciplinary hearings, appeals and adjudications. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above. For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
For the purposes of equal opportunities monitoring	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible. We do not currently collect information about your race or ethnicity, but if future regulations dictate that we have to record such information for the running of the club, then we shall do so.
To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements	Information about your criminal convictions and offences	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.

For some of your personal information you will have a legal, contractual or other requirement or obligation for you to provide us with your personal information. If you do not provide us with the requested personal information we may not be able to admit you as a member or we may not be able to properly perform our contract with you or comply with legal obligations and we may have to terminate your membership. For other personal information you may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our contract with you.

In terms of the health, medical and additional needs information you declare when joining the club or renewing your membership or informing us of a pertinent change in your health or requirements, please note the following points:

- All answers will be treated with confidence but this is balanced by the information being available when it is required to support the health and safety of the individual.
- If required a committee member may discuss further with the individual whether their safe participation in the sport is possible / whether they need to state that they have sought medical advice from a doctor and have received confirmation that they can participate in a sport in which water immersion is possible / how best to reduce the risks presented by their condition.
- If you have declared a medical condition, the club will retain the information in a folder at the club

- It will remain your responsibility to manage your condition, for example by carrying an asthma inhaler, an epipen etc. and by notifying relevant personnel (for example coaches or vice captain)

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

5. DIRECT MARKETING

We do not send general marketing information, however we will provide information on request and on our website. We may inform you by email, newsletters or through notices at the club or on the club website about products and services we believe you may be interested in, for example club kit, rowing courses, coaching courses. Please note that it is not possible to opt out of receiving club communications, as it not practical for us to separate communications relating to club news, membership processing and safety information.

6. DISCLOSURE OF YOUR PERSONAL INFORMATION

We do not share your personal information with external parties unless you have given your explicit consent, or we are legally obliged to. For example the following parties:

- **Any party approved by you.**
- **Event organisers:** where you have elected to take part in racing or recreational events, if the data is required to allow them to properly administer your participation in the event.
- **To governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional and national level, if required as you currently provide this information directly to them (e.g. British Rowing).
- **Other service providers:** for example, email communication (e.g. Mailchimp which the club currently uses to distribute club communications, we only share your name and email address)
- **The Government or our regulators:** where we are required to do so by law or to assist with their investigations or initiatives.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

7. TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

The personal information we collect maybe stored on recognised electronic storage platforms such as GoogleDrive and Microsoft Onedrive, these may store personal data outside of the United Kingdom (UK) and The European Union, however if this is the case they do state that they comply with European Commission approved model contract clauses (this effectively means it meets the EU's adequacy standard for privacy protection).

The personal information we collect may be transferred to and stored in countries outside of the UK and the European Union. Some of these jurisdictions require different levels of protection in respect of personal information and, in certain instances, the laws in those countries may be less protective than the jurisdiction you are typically resident in. We will take all reasonable steps to ensure that your personal information is only used in accordance with this privacy notice and applicable data protection laws and is respected and kept secure and where a third part processes your data on our behalf we will put in place appropriate safeguards as required under data protection laws. For further details please contact us by using the details set out in the "Contacting us" section below.

8. HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be

retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement we retain all physical and electronic records for a period of no more than 6 years after your last contact with us or the end of your membership. Exceptions to this rule are:

- Where you are no longer a member and request that any data recorded through the Membership application form be deleted; we undertake to remove or anonymise such data within 1 month of your request;
- CCTV records which are held for no more than 30 days unless we need to preserve the records for the purpose of prevention and detection of crime;
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than 12 months;
- Welfare case notes, grievance or disciplinary records are retained indefinitely;
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you through our online membership form. Alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

9. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstances;
- the right to request that we transfer elements of your data either to you or another service provider;
- the right to restrict processing of your personal information where certain requirements are met;
- the right to object to the processing of your personal information; and
- the right to object to certain automated decision-making processes using your personal information.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

10. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page and will re-issue the notice to members. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

British Rowing are developing an integrated suite of tools ("ClubHub") to manage clubs' storage and processing of membership data and the club may transfer members data to ClubHub, which is fully compliant with GDPR.

11. CONTACTING US

In the event of any query or complaint in connection with the information we hold about you, please email secretary@broxbournerowingclub.org or write to us at: Broxbourne Rowing Club, Old Nazeing Road, Broxbourne EN10 6QU.