# Introduction

This Privacy Notice explains in detail the types of personal data we may collect about you when you interact with us. It also explains how we'll store and handle that data, and keep it safe.

We know that there's a lot of information here, but we want you to be fully informed about your rights, and how Brixham Gig Rowing Club uses your data.

We hope the following sections will answer any questions you have but if not, please do get in touch with us.

It's likely that we'll need to update this Privacy Notice from time to time. We'll notify you of any significant changes, but you're welcome to come back and check it whenever you wish.

# 1. Who are Brixham Gig Rowing Club?

Brixham Gig Rowing Club is a Community Amateur Sports Club.

The club is based from the Gig Shed on the Breakwater slipway in Brixham and is run by volunteers.

## 2. Explaining the legal basis we rely on

The law on data protection sets out six ways which a company may collect and process your personal data, having analysed our membership database we have assess that Legitimate Interest is the primary basis Brixham Gig Rowing Club uses for processing personal data.

#### 3. When do we collect your personal data?

Personal data is collected from the following sources:

- Membership application forms completed when joining the club.
- When registering to use the Spond app.

## 4. What sort of personal data do we collect?

The personal data we collect is limited to the level we need to deliver our services and is made up of the following:

- Name
- Age
- Gender
- Rowing experience
- Email address
- Phone number
- Postal address
- Bank details??
- Any medical condition that could impact being able to row

#### 5. How and why do we use your personal data?

Your personal data is used to administer the club and to communicate internally with members.

- To communicate club events and activities
- To respond to your queries and complaints.
- To send you communications required by law or which are necessary to inform you about our changes to the management of the club. For example, updates to this Privacy Notice.
- To comply with our contractual or legal obligations to share data with law enforcement.

Of course, you are free to opt out at any time.

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

We use well established software to support our business and all software companies used have provided us with their GDPR Privacy Policy

- Microsoft Office 365 Privacy Notice
- Spond <u>Privacy Notice</u>

In addition, we have internal processes for any committee members which clearly states their terms of reference and how personal data will be used.

## 7. How long will we keep your personal data?

Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected.

At the end of that retention period, your data will either be deleted completely or anonymised, for example by aggregation with other data so that it can be used in a nonidentifiable way for statistical analysis and business planning.

#### 8. Who do we share your personal data with?

Your personal data is only used to manage the club activities.

## 9. Where your personal data may be processed

Protecting your data outside the EEA

The EEA includes all EU Member countries as well as Iceland, Liechtenstein and Norway.

We may transfer personal data that we collect from you to third-party data processors in countries that are outside the EEA such as Australia or the USA. This will only be done using the technology solutions highlighted in section 6.

If we do this, we have procedures in place to ensure your data receives the same protection as if it were being processed inside the EEA. For example, our contracts with third parties stipulate the standards they must follow at all times. Any transfer of your personal data will follow applicable laws and we will treat the information under the guiding principles of this Privacy Notice.

# 10. What are your rights over your personal data?

The GDPR provides the following rights for individuals:

- 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

Where any subject access request is made there is a requirement to prove identity before any information is divulged. This may involve physical presence with accompanying ID.

Where a request to "Be forgotten "is made that can only be complied with if there are no other legal frameworks that overrule GDPR. Examples would be HMRC, FCA, etc.

# 11. Links to other websites

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

# 12. Regulation changes and remedial actions

The GDPR went live on 25<sup>th</sup> May 2108 and the UK Data Privacy Bill achieved Royal Ascent on 23<sup>rd</sup> May 2018. This Notice is based on the regulations as they exist with a review process set up to make any adjustments required to become and stay compliant.

In the event of any changes or processes which need remedial action the review procedure will capture those issues and remedy them.

## 13. Contacting the Regulator

If you feel that your data has not been handled correctly, or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the Information Commissioner's Office.

You can contact them by calling 0303 123 1113.

Or go online to <u>www.ico.org.uk/concerns</u> (opens in a new window; please note we can't be responsible for the content of external websites)

If you are based outside the UK, you have the right to lodge your complaint with the relevant data protection regulator in your country of residence. Details can be found in Section 16.