



## CALSHOT WINDSURFING CLUB DATA PRIVACY POLICY

This document outlines how the Calshot Windsurf Club processes and manages personal data in accordance with the **General Data Protection Regulation (GDPR)** which came into force on 25<sup>th</sup> May 2018.

### 1. About this Policy

#### 1.1 This policy explains

- a. When and why we collect personal information about our members.
- b. How we use personal information.
- c. How we keep it secure.
- d. Your rights in relation to it.
- e. The process of Subject Access Requests.

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 without prior notice. You are advised to check our website page on [www.cwacs.co.uk](http://www.cwacs.co.uk) for any amendments.

1.4 We will always comply with the General Data Protection Regulation (**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](http://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 are we?

2.1 We are the **Calshot Windsurfing Club**. The Club Secretary can be contacted by email at: [naishuk2@aol.com](mailto:naishuk2@aol.com)

### 3. What information we collect and why.

Type of information	Purposes	Legal basis of processing
Member's name, address, telephone numbers, e-mail address(es).	Managing the Member's membership of the Club.	Performing the Club's contract with the Member.
	For the purposes of running the club.	For the purposes of our legitimate interests in operating the Club.
	Keeping in touch with the Members who have <b>opted IN on the sign up</b>	

	<b>process</b> to receive information from the club such as newsletters, notification of events, targeted communications to categories of members and general information.	Liaising with Calshot Activities Centre to assist in managing the campsite.
<b>Type of information</b>	<b>Purposes</b>	<b>Legal basis of processing</b>
Emergency contact details	Contacting next of kin in the event of emergency	Protecting the Member's vital interests and those of their dependants
Name and e-mail address whilst a current member and for up to [a year] after ceasing to be a member of the Club.	Creating and managing the Club's online Membership Directory.	For the purposes of our legitimate interests in operating the Club.
Photos and videos of Members and caravan/tent.	Putting on the Club's website page, social media pages, newsletter and using in press releases.	<b>Consent.</b> We will seek the Member's consent on any membership or additional event form.  Members may withdraw their consent at any time by contacting the club secretary by e-mail.
Name, e-mail address and telephone number of each Club Officer.	Information published on the Club's website page, in newsletters and other publications as a point of contact for members.	For the purposes of our legitimate interests in operating and promoting the Club.
Name, e-mail address and telephone number of each Club committee member	Information published on Club's website page or newsletters.	For the purposes of our legitimate interests in operating and promoting the Club .

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

4.1 We will not transfer your personal data to a third party without your consent.

4.2 Our process for the collection of membership fees and club event fees is security protected according to accepted standards of technology in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

4.3 Please note however that where you are transmitting information to us over the internet this can never be guaranteed to be 100% secure.

4.4 The Club Secretary shall be responsible for holding personal data on his/her own personal computer media. (cloud storage by third party organisations shall not be employed).

4.5 Electronic files will be password protected and only held on media with further protection applied, if accessible from the internet.

4.6 Hard copy and electronic copies of members' data, eg. Membership application forms or temporary extractions of specific data shall be secured from access when not being used.

4.7 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

4.8 Any member, on request, shall be provided with a copy of the data held relating to themselves within a reasonable length of time. (eg 14 days)

## **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 we are required to do so by law or as set out in the table above or in paragraphs 5.2 and 5.3 below.

5.2 We will share your personal data with the Calshot Activities Centre for the purposes of enabling the Centre to carry out its duties as site owner.

5.3 We may pass your personal data to third parties when it is in the legitimate interest of the club to do so as set out in the table above.

5.4 All Data held is intended only for the use of the Club Committee as set out in the table above

## **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 it is in the Clubs' legitimate interest to do so or for as long as is necessary to comply with our legal obligations.

6.2 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 that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

6.3 We securely destroy all financial and other information once we have used it and no longer need it. (for hard copies, shredded as a minimum; for electronic copies deleted from all media).

## **7. Your rights explained.**

7.1 You have rights under the GDPR:

- to access your personal data.
- to be provided with information about how your personal data is processed.
- to have your personal data corrected.
- to have your personal data erased in certain circumstances.
- to object to or restrict how your personal data is processed.
- to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

## **8. Subject Access Requests**

We will request verification of the identity of any individual making a request, ask for further clarification and details if needed and respond within one calendar month once we have confirmed it is a legitimate request. In accordance with ICO guidelines, we keep a log of Subject Access Requests that contains details of the request, including that which can identify you personally, indefinitely.

Data subjects have the right to the following:

- To be told whether any personal data is being processed.
- To be given a description of the personal data, the reasons it is being processed and whether it will be given to another organisation or people.
- To be given a copy of the information comprising the data and given details of the source of the data where this is available.

<https://ico.org.uk/concerns/>

0303 123 1113.

### **Information Commissioner's Office**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF

For more details, please address any questions, comments and requests regarding our data processing practices to our Club Secretary.

### **Calshot Windsurfing Club Responsibility Statement:**

The information contained in this Guidance represents Calshot Windsurfing Club's interpretation of the law as at the date of this edition and takes all reasonable care to ensure that the information contained in this Guidance is accurate and that any opinions, interpretations and guidance expressed have been carefully considered in the context in which they are expressed. However, before taking any action based on the contents of this Guidance, readers are advised to confirm the up-to-date position and to take appropriate professional advice specific to their individual circumstances.