

**Warwick Boat Club
Personal Data Privacy Policy
May 2018**

Introduction

We are responsible for the privacy of any personal information that you may provide to us or which we collect through your activity at Warwick Boat Club. We take this responsibility seriously. This document sets out how we handle personal data and how you can inform us of your preferences regarding your personal data.

Overview – Please read this even if you are not interested in further details!

In brief, we capture and process the personal data of our members to allow for proper collection of membership and other fees, administration of sports and social events and to control access to our pavilion. We record details of your access to our grounds and pavilion to maintain security of our facilities.

We share some membership data with the national regulatory bodies of the sports we provide. We also transfer your personal data to external data processing systems for our website, email broadcasting, court booking, accounting and other services. In each case, we hold a suitable data processing contract to ensure the service providers are required to secure our data, including your personal data.

We will remove your personal data from our operational systems after a specified period (e.g. 7 years after your membership lapses) and move this data into an archive that is used only for statistical analysis. The club has membership records going back many decades and we preserve these as an important historical document that we ultimately donate to the Warwickshire County Records Office.

You have a right to see the personal data we hold on you, to instruct us how we may or may not use your personal data and to ask us to remove your personal data. To make any such request or instruction, please use the contact details shown below.

Our promise to you

We promise not to bombard you with emails! Occasionally we might let you know if we are holding an event, or send you an update with news from the club.

Our details – Who you are sharing personal data with

We are a members' sports club operating as a company limited by guarantee:

The Warwick Boat Club Limited
33 Mill Street
Warwick
CV34 44HB
United Kingdom

We are registered in England No. 00077258 and were incorporated on 4th May 1903.

Our Data Protection Officer is James Alty.

His contact email address is: data.privacy@warwickboatclub.co.uk

You can contact us by writing to the club at the address given above, by using our website general enquiry form, by email to data.privacy@warwickboatclub.co.uk or by telephone on 01926 407938.

The details – The basis of our personal data processing

We capture, store and use your personal data on the basis that this is necessary for us to fulfil your membership contract and for our legitimate interests in managing a members' sports club and in communicating with our members promoting our sporting activities and social events.

By providing your personal data (name, address, email address, phone numbers, children's names, etc.), you freely consent to The Warwick Boat Club Limited ("WBC") holding and using your personal data for the operation of the club and for the purposes set out in this privacy policy.

As described below, you may opt out of this personal data processing in a variety of ways.

How do we use your personal data and why?

We collect your personal data from printed and online application forms that you complete, subsequent correspondence with you and from the access control system on our car park and pavilion. We use this information in a variety of ways:

Membership Database

We keep the primary record of your personal data in our membership database. This database records details of your home address and each of the people at your household who have ever either given their details or had their details provided by others. This includes prospective, current and lapsed members of WBC. This personal data may include details of children at the household where those details are provided by their parents or guardians. We use this membership database to track your membership status, your contact details, your payment history, your allocated car park and pavilion access cards, your direct debit mandates, your communication contact preferences, etc.

Email Broadcasting

Periodically, we extract data from the membership database to update our "MailChimp" email broadcasting system. For our general communications, we only include those members who have not opted out of email communications. We group together all such people who have registered the same email address and address them with a composite salutation of all the member names. If any of the people sharing an email address opts out

of further MailChimp communication, all people using this email address will cease to receive WBC communications.

We also use the MailChimp system for the annual invoicing email, which is sent to the nominated head of the household, typically the member with the highest value membership. Occasionally, we contact lapsed members with special offers to rejoin the club.

MailChimp allows us to see statistics and individual details of email delivery, clicks and bounces using industry standard technologies to help us monitor and improve our emails.

Access Control

We also store some personal data in the NorPass access control system. This system enables us to provide you with pavilion and car park access cards that permit you to enter the pavilion and optionally the car park. This system records each use of these access cards, the date, time, which door or barrier and whether the access was granted or not. We use this information to control and monitor access to the car park and pavilion and ensure that only paid members may use our facilities.

Court Booking

We store some personal data in the MyCourts and ClubSpark court booking systems to enable us to offer you online and touchscreen court booking and other services. These systems require your personal data to identify you, to allow other members to contact you and to authorise and monitor your court bookings etc. These systems also include some communication tools which allow league organisers, competition organisers, team captains etc. to email or otherwise communicate with you. In each case, you may choose to opt out of such communications.

CCTV

We operate a closed circuit television system to record activity around the public parts of our site to protect all members from malicious activity. The images recorded by the CCTV system are automatically overwritten after one month. Access to the CCTV system is restricted to a small group of authorised club staff and officers.

Club Administration

We use a variety of systems that hold personal data for club administration, including banking, accounting, payroll, recruitment and general email tools. We also use a variety of tools to understand website, social media and offline activity to assess the success of marketing initiatives and inform relevant marketing communications. We hold personal data on our staff and on those people who apply to work for WBC. This data is sourced from job application forms and subsequent employment records.

Who we share your data with and why?

For some purposes, we use contracted service providers and may transfer your personal data to them wherever they may be located in the world in order to benefit from the service

they offer. We hold a contract with each service provider to ensure our data, including your personal data is secured.

Our contracted service providers are:

- EasySpace
An internet service provider who host our website which includes contact forms;
- Edge of the Web
Our web site designers who may occasionally access the logs of activity on the web site to support its correct operation;
- Google
We use the Google Analytics system to track visitor behaviour on our website. Google Analytics using a cookie stored by your web browser to recognise when you return to visit the website again;
- MailChimp
Our email broadcasting system, used for the primary communications from the club;
- Facebook and Twitter
Our social media channels where you may interact with posts or tweets we make;
- Barclays, Lloyds, PayPal and GoCardless
Our banking and financial transaction systems which we use for tracking payments from members and to suppliers;
- Xero
Our online accounting system, used to plan and track our income and expenditure;
- MyCourts & ClubSpark
Our court booking systems, used for reserving our sporting facilities, running leagues and competitions, etc.
- Dropbox
Our online backup system, used to ensure the club cannot lose data and to synchronise some data between machines.
- Mi-Voice
Our online voting system used for proxy votes at annual and extraordinary general meetings;
- Survey Monkey
Our online surveying tool used for gathering member feedback;
- Harben Barker
Our payroll provider, who receive personal data of our staff.

Other service providers may be contracted from time to time with the approval of the general committee of WBC. We will endeavour to keep the list of contracted service providers in this privacy policy up to date. However, if you enquire about your personal data held at WBC, we will be able to declare all contracted service providers at that time.

We may also share some of your personal data with the national governing bodies of the sports in which you participate. Your WBC membership fee may include subscription to these national governing bodies who provide additional membership benefits such as insurance, events, awards, competitions, ranking, discounts, regulation of coaches, safeguarding etc. In each case, we transfer the standard information requested by the national governing body.

The national governing bodies we currently work with are

- The Lawn Tennis Association – see www.lta.org.uk
- England Squash – see www.englishsquash.com
- British Rowing – see www.britishrowing.org
- Bowls England – see www.bowlsengland.com

Other Data Sharing

We do not share or allow access to your personal data for any third party for any form of commercial activity. We use your personal data only for the operation of WBC, our sports and services and not for any other activity.

Who has access to your data?

Your personal data will only be seen and used by staff and authorised committee members of WBC and authorised staff of our contracted suppliers. All staff and committee members are reminded of their obligation of confidentiality when they take the role with WBC. Our contracts with suppliers require them to maintain confidentiality of our data.

Data retention

We will store your personal data for as long as you are a member of the club and for 7 years after your membership ceases. This period enables us to fully comply with our obligation to keep business records. After this period, we will archive your personal data so it cannot be used for operational purposes.

If you enquire about joining WBC, but do not proceed to join the club, we will archive your details one year after your last enquiry. This period is to enable us to recognise your previous interest if you contact us again.

We will keep the archived information for statistical and historical purposes to allow WBC to show the changing characteristics of our membership over the long term. If you do not wish your data to form part of this historical archive, please contact us to request your data is removed.

Confidentiality and security of your data

WBC will take all reasonable steps to ensure that your personal data is kept secure.

In order to process and store your data, we may use third party software providers with servers situated in countries outside Europe (including the USA) that do not always have the same standards of data protection laws as the UK. However, we will ensure that contractual or other safeguards are in place to ensure that your information is adequately protected, such as by ensuring that Privacy Shield certification is in place. You can learn more here: <https://www.privacyshield.gov/welcome>

Your data and rights

You have the following rights regarding the personal data we process. If you wish to make any instruction or request regarding your personal data, please email our data protection officer at data.privacy@warwickboatclub.co.uk.

- **Your personal information – access request**
You are entitled to know if we process your personal information and request a copy of the details we hold.
- **Data rectification – correcting mistakes**
You are entitled to instruct WBC to correct any personal information that is incorrect.
- **Stop data processing**
You are entitled to request that we stop processing your personal data.
- **Stop direct marketing – opting out**
You are entitled to object to the processing of your personal data for the purposes of marketing. To do so, please email data.privacy@warwickboatclub.co.uk specifying the email address you wish to opt out and confirm your contact details for cross reference.

We mainly send club communications via email and we will always give you the opportunity to unsubscribe from our emails by providing an unsubscribe link. Simply click on the unsubscribe link at the bottom of the email to update your preferences. NB Opting out of marketing communications will not stop WBC sending operational membership invoice and payment confirmation emails.

- **Data portability – moving data**
Under appropriate circumstances you are entitled to request that the personal information we hold is shared with another organisation. For example, you might want to transfer your sporting qualifications information to another club.

- **Right to erasure**
You are entitled to request that we erase the personal data that we hold on you.
- **Object to profiling & automated decision making**
You are entitled to object to the use of your personal information for profiling or automated decision making. NB we do not currently perform any profiling or automated decision making at WBC.
- **Right to complain - Information Commissioner's Office (ICO)**
If you are not happy with the way WBC processes your personal information then you can report a concern to the ICO. Visit <https://ico.org.uk/concerns> for more information.

Our use of cookies

Cookies are small text files that are placed on your computer's hard drive through your web browser when you visit a web site. They are widely used to make web sites work, or work more efficiently, as well as to provide information to the owners of the site.

Like all other users of cookies, we may request the return of information from your computer when your browser requests a web page from our server. Cookies enable our web server to identify you to us, and to track your actions and the pages you visit while you use our website. The cookies we use may last for a single visit to our site (they are deleted from your computer when you close your browser) or may remain on your computer until you delete them or until a defined period of time has passed.

Although your browser software enables you to disable cookies, we recommend that you allow the use of cookies in order to take advantage of the features of our website that rely on their use. If you prevent their use, you will not be able to use all the functionality of our website. Please refer to your browser's 'help' functionality for advice or to find out more.

We use:

- Our own cookie to allow essential parts of our web site to operate for you;
- Third party cookies from Google Analytics to collect information about how visitors use our site. We use the information to improve your experience of our site. This cookie collects information in an anonymous form, including the number of visitors to the site, where visitors have come to the site from, and the pages they visited.

Data Breach – What Happens

In the unlikely event that we suffer a data breach, we will inform you within 72 hours of becoming aware of the breach, as required by the General Data Protection Regulations.

Changes to this personal data privacy policy

We keep our personal data privacy policy under regular review. This privacy policy was last updated on 24th May 2018. This policy supersedes the references to the Data Protection Act included in our membership contract. All other terms of the membership contract are unaffected.

Should the purposes for which WBC holds or processes your personal information change, you will be notified of such changes on this page and by email unless you have opted out of communications.

Questions

Any questions regarding our Personal Data Privacy policy should be directed to

James Alty
Data Protection Officer
Warwick Boat Club
data.privacy@warwickboatclub.co.uk

Version 1.0 - 24th May 2018