



## Purley Canoe Club Privacy Policy

### 1. About this Policy

- 1.1 This policy explains when and why we collect personal information about our members, how we use it and how we keep it secure and your rights in relation to it.
- 1.2 We may collect, use and store your personal data, as described in this Privacy Policy and as described when we collect data from you.
- 1.3 We reserve the right to amend this Privacy Policy from time to time without prior notice. You are advised to check the Purley Canoe Club (PCC) website <https://www.purleycanoeclub.co.uk/> regularly for any amendments (such amendments will not apply retrospectively).
- 1.4 We will always comply with applicable UK Data Protection legislation including 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 Purley Canoe Club. We can be contacted via our website- <https://www.purleycanoeclub.co.uk/> or via email [“tellmemore@purleycanoeclub.co.uk”](mailto:tellmemore@purleycanoeclub.co.uk)

### 3. What information we collect and why

Type of Information	Purposes	Legal Basis of Processing
Members’ name, address, telephone numbers, email addresses	Managing the Club membership for the member.	Performance of the club’s contract with the member. Our legitimate interests in operating the club.
Name and age of member dependents	Managing member and dependents’ membership	Performance of the club’s contract with the member.
Emergency Contact Details	Contacting next of kin in event of emergency	Our legitimate interests in meeting our duty of care to members

(See Appendix 2 – “GDPR and PCC Images”; and the “PCC Policy for storing medical and next of kin details” in Section 21 of the PCC Constitution.)

### 4. How we protect your personal data

- 4.1 We will not transfer your personal data outside the European Economic Area without your consent.

4.2 We have implemented generally accepted standards of technology and operational security 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, then given the internet is not a secure medium, we cannot definitely guarantee the security of this information.

4.4 For any payments which we take from you online we will use a recognised online secure payment system.

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

## 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 required to do so by law or as set out in the table in paragraph 3 above or paragraph 5.2 below.

5.2 We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

## 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 is necessary to comply with our legal obligations. 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 with the exception of retaining your personal data in an archived form in order to be able to comply with future legal obligations, including but not limited to compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims. (See Appendix 1 "Data Retention" for an outline of how long we retain information)

6.2 We securely destroy all financial information once we have used it and no longer need it.

## 7. **Your rights**

7.1 You have rights under UK and EU data protection law, including:

- (a) to access your personal data

- (b) to be provided with information about how your personal data is processed
- (c) to have your personal data corrected
- (d) to have your personal data erased in certain circumstances
- (e) to object to or restrict how your personal data is processed
- (f) to have your personal data transferred to yourself or to another business in certain circumstances.

7.2 If you wish for us to erase your data as outlined in paragraph (3) above then please contact us via our website <https://www.purleycanoecub.co.uk/> or via email ["tellmemore@purleycanoecub.co.uk"](mailto:tellmemore@purleycanoecub.co.uk)

7.3 If you have any concerns about how we process your personal data please contact us via our website <https://www.purleycanoecub.co.uk/> or via email ["tellmemore@purleycanoecub.co.uk"](mailto:tellmemore@purleycanoecub.co.uk)

7.4 You also have the right to take any complaint about how we process your personal data to the Information Commissioner:

<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 Data Protection Officer Alan Goodman via the website <https://www.purleycanoecub.co.uk/> or via email [DPO@purleycanoecub.co.uk](mailto:DPO@purleycanoecub.co.uk)

## PCC Privacy Policy – Appendix

### Appendix 1 -Data Retention

Here is a guide on how long the Club holds onto your data:-

Type of detail	Timescale	Notes
General membership details e.g. Name, Telephone, Address, etc	3 months after your membership has lapsed i.e. 30 <sup>th</sup> June	Membership Renewal is due on the 1st April, each Financial Year
Next of Kin Details	3 months after your membership has lapsed	Membership Renewal is due on the 1st April
Personal Medical details	3 months after your membership has lapsed	Membership Renewal is due on the 1st April
PCC Personal Website account	3 months after your membership has lapsed	Membership Renewal is due on the 1st April
PCC Club Official qualification s, e.g. coaching qualifications, First Aid qualifications, DBR registration etc	3 years after your membership has lapsed	Membership Renewal is due on the 1st April, each Financial Year
Financial data & transactions	7 years after the end of the financial year in which the Financial transaction occurred	The Financial year runs from the 1 <sup>st</sup> April to the 31 <sup>st</sup> March the following year.
Incidents involving Adults (over 18 years)	3 years after the incident occurred	
Incidents involving Juniors (under 18 years )	Until the junior has reached the age of 21 years.	

### Appendix 2 - GDPR and PCC Images

Personal information under GDPR includes photographs, videos and images of people. This is because of the facial recognition software.

When PCC stores and uses images of participants in club events, we process it, like any of your other personal data, e.g. name, telephone numbers, email address, etc.

- All participants in PCC events have a right to be informed that we are taking photos and how these photos are being used. All participants will be asked to sign an “opt-in” clause on their PCC Consent form, or Membership / Membership renewal form. If a participant hasn’t opted-in and consented to their photo being used, we will not use those images.
- All Participants in PCC Events have the right to access, their personal photos on request, and receive confirmation regarding how these are being used.
- All Participants in PCC Events have the right to be forgotten. Individuals have the right to request photos to be removed from the PCC website, or future versions of printed materials.
- If the photos feature children under the age of 18, parental consent must be given either on their PCC Consent form, or Membership / Membership renewal form.

- Video's of Club activities are placed on the PCC Website, and they are hosted through Third Party web based hoist e.g. "YouTube". Club members upload their personal videos onto these external website host, a link to this site is then created on the PCC Website. Individuals have the right to request that this link is removed from the PCC website. However Purley Canoe Club is not responsible for the original video and the hosting of this video as it is the responsibility of the member who created and uploaded the video onto the external website provider.
- Also refer to the BC Photographic guidelines ( see PCC Constitution section 21)