

LAKELAND ROWING CLUB

DATA PROTECTION POLICY

CONTEXT AND OVERVIEW

Key Details:

- Organisation: Lakeland Rowing Club
- Company Number 10768742
- Registered Address: Bridge End Farm, Ullock, Workington, Cumbria, CA14 4TP
- Contact: The Secretary at the above address, or email at Fiona.lrc@btinternet.com

- Member data held by Webcollect: **WebCollect**, Open Brackets Limited, 1 Powell Road, Poole, BH14 8SG, **Phone:** 020 7183 2021, **Email:** info@webcollect.org.uk
And others, for specific circumstances, as specified in Appendix F

- Policy Prepared by: Fiona Hammond
- Approved by Committee on: 8th May 2018
- Policy became operational on: 25th May 2018
- Next Review Date: As necessary but in any event, not later than 25th May 2020

INTRODUCTION

Lakeland Rowing Club ("LRC") needs to gather and use certain information about individuals. These individuals include members, suppliers, business contacts and other people individually or in organisations with which the Club has a relationship or may need to contact.

This policy describes how personal data must be collected, handled, stored to meet the Club's data protection standards and to comply with the law.

POLICY STATEMENT

Lakeland Rowing Club commits to complying with the law and good practise in relation to data security. It will respect individual's rights, will be honest and open with all individuals about whom data is held and will provide information to individuals about their rights. Where necessary or good practise, it will notify the Information Commissioner.

WHY THIS POLICY EXISTS:

This data protection policy ensures Lakeland Rowing Club

- Complies with data protection law and follows good practise
- Protects the rights of members, partners and others who have dealings with the Club
- Protects itself from risks of data breach

DATA PROTECTION LAW

The General Data Protection Regulations (GDPR) describe how organisations – including LRC – must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials. To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully. Under GDPR, the data protection principles set out the main responsibilities for organisations. GDPR requires that personal data shall be:

- Processed fairly, lawfully and transparently;
- Be obtained only for specific lawful purposes;
- Be adequate, relevant and not excessive;
- Be accurate and kept up to date;
- Kept for no longer than is necessary
- Processed in accordance with the rights of data subjects;
- Protected in appropriate ways
- Not be transferred outside the European Union unless that country or territory ensures and adequate level of protection.

POLICY SCOPE

This policy applies to:

- The registered office of Lakeland Rowing Club;
- The Boathouse occupied by Lakeland Rowing Club at Isthmus Keswick, Cumbria;
- Any other place from which activities of LRC are managed or controlled.
- All members of LRC (and in relation to junior members their parents or legal guardian's)
- All contractors, suppliers and others working on behalf of LRC.
- Data processors who carry out the practical task of collecting and storing members information

It applies to all data that LRC holds relating to identifiable individuals, even if that information technically falls outside the GDPR. This can include name of individuals, postal address, email address, telephone numbers, and any other information relating to any individual in whatever form acquired or held.

INFORMATION COLLECTED BY LRC

The Club collects specific information about members as set out in Appendix A.

The Club also holds specific information about its directors as set out in Appendix B.

The Club manages special information as referred to and set out in Appendix C

The Club may collect and keep records of members activities, relevant qualifications and accidents as set out in Appendix D

The Club collects information about directors and other officers which may be used for registration with third parties as set out in Appendix E

The Club uses the services of third parties which may involve the provision of personal data as set out in Appendix F

The Club from time to time holds contact information about people in other organisations which may be provided by 3rd parties (i.e. email addresses, telephone numbers and business address) to enable

it to secure funding, professional advice, insurance and to purchase or maintain equipment. Details of the management of this is set out in Appendix G.

The purposes for which LRC collects the information and the situations in which it will use or disclose information to third parties is set out in each Appendix. The data is not held and will not be shared for any marketing, or commercial purposes. LRC will not sell rent or trade any personal data. Other than any service provider referred to in Appendix F, no information will be transferred to any organisation outside the United Kingdom or the European Union

DATA PROTECTION RISKS:

This policy helps to protect LRC from some very real data security risks including:

- breaches of confidentiality: for instance, information being given out inappropriately
- failing to offer choice: for instance, all individuals should be free to choose how the club uses data relating to them.
- Reputational damage: for instance, the Club could suffer if hackers successfully gained access to sensitive data.

DATA PROTECTION RESPONSIBILITIES

Everyone who is a member of or works for or with LRC has some responsibility for ensuring personal data is collected, handled and stored appropriately. Each person who handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

The Board of Directors is ultimately responsible for ensuring that LRC meets its legal obligations.

The Club Committee is responsible for day to day implementation of, compliance with and regular review of this policy

The Secretary is responsible for:

- Keeping the Board and the Committee updated about data protection responsibilities, risks and issues;
- Reviewing all data protection procedures and related policies in line with an agreed schedule
- Where necessary, arranging data protection training and advice for people covered by this policy
- Handling data protection questions from members and anyone else covered by this policy;
- Dealing with requests from individuals to see the data LRC holds about them (also called subject access requests)
- Checking and approving any contracts with third parties that may handle LRC's sensitive data.

LEGAL BASIS FOR HOLDING INFORMATION

The legal basis for holding the information is:

1. In the case of all information in Appendix A, the legitimate interests of the Club which are more fully set out at Appendix A.
2. In the case of information held as set out in Appendix B, to comply with statutory requirements.
3. In the case of special category information: the lawful basis is the legitimate interests of the club and the special category basis is Vital Interests as more fully described in Appendix C;
4. In all other cases, the legitimate interests of the Club.

MANAGING DATA

These rules describe how and where data should be safely stored. Questions about storing data can be directed to the Secretary.

Where data is stored on paper, it should be kept in a safe place where unauthorised people cannot see it.

Where data is stored electronically but printed out for some reason,

- when not required it should be kept in a safe place where unauthorised people cannot see it
- when no longer required it will be shredded and disposed of securely

When data is stored electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts.

RETENTION

Member data will be disposed of and erased from any records at the later of :

- the cessation of membership or
- the last date on which the information must be kept for statutory or any other legal or regulatory purposes

Director Data will be retained until the time for which the information is required to be held has expired

For all other information it will be disposed of when the purposes for which is collected or received has been fulfilled unless there is, in any specific case, a legal obligation or purpose which requires longer retention in which case it will be disposed of when legally mandated or the legal purpose if fulfilled.

GENERAL MEMBER GUIDELINES

- All members must read and accept this policy
- The only people able to access data covered by this policy are those who need it for a legitimate purpose connected with those activities of the club for which they are responsible;
- Data should not be shared informally; when access to confidential information is required members may request it from the Membership Secretary or the Treasurer who may provide it if it is requested for a reason set out in Appendix A.
- If access to the information in Appendix B is requested, a request shall be made to the Secretary. The information may be released if it is on the public record of Companies House or any other regulator which obliges the retention of the data. Otherwise that data will not be released without the clear and express consent of the relevant data subject.
- Information in Appendix C will not be shared except in the circumstances set out in Appendix C.
- Information referred to in Appendix D will be kept in the locations set out in Appendix D. If a data subject so requests, it will be removed from the record subject to any statutory requirements for retention or to protect the Club in the event of any claim under any insurance policy or to initiate or defend any legal proceedings.

- Information referred to in Appendices E, F & G will not be shared except in the circumstances set out in those Appendices.
- LRC will, where required, provide training to all members to help them understand their responsibilities when handling data
- Members should keep all data secure by taking sensible precautions and following the guidelines in this policy;
- Strong passwords should be used where appropriate and they should never be shared
- Personal data should not be disclosed to unauthorised people either within the Club or externally
- Data should be regularly reviewed and updated: if it is found to be out of date it will be corrected. If it is no longer required it will be deleted and disposed of.
- Members should request help from the Secretary if they are unsure about any aspect of data protection.

DATA STORAGE & ACCURACY

The law requires LRC to take reasonable steps to ensure that data is accurate and kept up to date. Data will be held in as few places as possible and as specified in appendices A-G. LRC will make it possible for members to update their personal details via the website. Information can also be updated at each year on renewal of membership. Data will be updated as inaccuracies are discovered.

SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by LRC are entitled to:

- ask what information LRC holds about them and why
- ask how to gain access to it
- be informed how to keep it up to date
- be informed how the Club is meeting its data protection obligations.

If an individual contacts the Club requesting this information, it is called a subject access data request

Subject access data requests should be made or forwarded by email to the Secretary at Fiona.lrc@btinternet.com or by letter to the Secretary at the registered office of the Club.

The Secretary will aim to provide the relevant information within 14 working days but will not take longer than the time specified in GDPR.

The Secretary will always verify the identity of anyone making a subject access request before handing over any information.

DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the GDPR permits personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances LRC will disclose the required data. However, the Secretary will ensure the request is legitimate, seeking assistance from the Board and the Clubs legal advisers as necessary.

PROVIDING INFORMATION

LRC aims to ensure that individuals are aware that their data is being processed and they that understand

- How the data is being used
- How to exercise their rights

To these ends the Club has a privacy statement setting out how data relating to individuals is used by the Club. A copy of this is on the Club website.

DATA BREACHES

Breaches of data protection requirements for data held by Webcollect will be dealt with by Webcollect under the terms of its Privacy Policy. The Club will take reasonable steps to ensure that Webcollect enforce and comply with its policy where necessary. If a breach is notified to the Club the Club will immediately notify affected members.

If a breach of data protection for information held under Appendix B occurs the Secretary will notify the affected director. If that information is publicly available then no further action is required. If it is not publicly available, then all efforts will be made to recover it and to ensure that hard copies are located and destroyed.

Breaches of data protection for data held by the parties referred to in Appendix G will be dealt with by those parties under the terms of their own privacy policies. The Club will take reasonable steps to ensure that those third parties enforce and comply with their policies where necessary. If a breach is notified to the Club the Club will immediately notify affected members.

For all other breaches, the Club will notify the affected individuals and will make reasonable efforts to retrieve data or to ensure its disposal from other party's systems

CLUB COMMUNICATIONS

The Club has arranged for closed group pages to be set up on Facebook for senior club members and junior club members. The pages are separate.

Only senior members have access to the senior members page. Only junior members, their parents and senior club members associated with managing the junior club may have access to the Junior Facebook page.

Members who wish to avail themselves of this service must have a Facebook account. The data they supply will be supplied to Facebook and managed in accordance with Facebooks' privacy policies and notices.

No member is obliged to join Facebook. Alternative means of communication will be considered for those who are unwilling or unable to join Facebook. Junior members must be aged at least 14 years therefore the age restriction on the use of Facebook will not be a barrier to use of Facebook by the Junior club.

Other pages may be set up for groups within the Club

Facebook is the primary means by which the Club communicates with its membership as a whole and by which members communicate among themselves. It is entirely voluntary and the information that members post about themselves on the Facebook page is entirely voluntary. All members should be aware that anything they post on Facebook is open to all who have access to that page. Members must therefore when directing a post at another specific individual or individuals, limit their posts to Club matters and refer to those individuals by their name as advertised on the page only. The Club does not process and has no responsibility for personal data posted by members on Facebook.

However, by joining the Club Facebook pages, all members acknowledge that:

- (i) they are aware that their names may be mentioned in posts by other members for communication of information or responding to queries;
- (ii) Photographs or videos of club activities which may include recognisable images of individual members may be posted:
 - a. By coaches or those supervising the juniors on the Junior Facebook page for the purposes only of providing coaching feedback, comments, tips or reinforcements or to inform the junior membership more widely about Junior Club or individual junior club member activities and achievements. No photograph or video containing a recognisable image of any junior will be posted by any person other than on the junior Facebook page without the prior consent of that juniors' parent or legal guardian.
 - b. By any member of the senior club on the senior club page to provide coaching feedback, comments, tips or reinforcements or to inform the Club membership more widely about club or individual senior Club member activities and achievements. Photographs of activities of the senior Club may also be used on the public Club website in order to promote the Club or provide information about its activities.

Any person (or in the case of junior members, their parents or legal guardian(s)) may at any time decide that they do not or, as the case may be, no longer wish photographs or videos which include recognisable images of themselves to be posted as described in this policy. In such cases they should write to the Club Secretary at the Club Registered address or by email to Fiona.lrc@btinternet.com

EVENTS

If the Club organises events that require the capture of personal information it will seek consent of all participants. In seeking consent, it will make clear what the information will be used for and who will be responsible for managing the data captured. In the case of British Rowing affiliated competitions, the BROE2 entry process will manage the consent process for every competitor. If the Club uses a regatta management software solution it will ensure that it complies with the requirements of this policy.

EMAIL ADDRESSES

Except as referred to below, members email addresses will not be provided to any other person without the specific consent of the person involved and will be used only for the purposes for which it is provided. Whole club emails and any emails sent to external bodies will be sent on a blind copy basis.

All directors and committee members acknowledge that their email addresses may be used for external communication with others, to enable contact to be made by others, and that those addresses may be given to third parties associated with the Club or as part of an email sent to several recipients where it is necessary for all recipients to have all email addresses. For any other external emails, the circulation will be on a blind copy basis.

Members who provide specific services to non-club members on behalf of the Club acknowledge that their email addresses may be made available on the Club website only to extent and for the time necessary for them to provide that service.

If there is a breach of this requirement, then all affected members will be advised.

APPENDIX A: MEMBER INFORMATION

The Club collects the following information from members on joining the Club and at renewal if any information has changed.

- First Name
- Surname
- Address
- Telephone number
- Email Address
- Age
- Whether they can swim 50m fully dressed
- Payment details if paying through paypal or via other online service providers

The Club collects this information as the minimum information it requires in order to maintain a comprehensive list of members and their basic contact details.

The need to know about swimming is to ensure their safety in a water-based sport.

The information is used to provide records of membership and payment of subscriptions, to make contact with members on a private and confidential basis and, if that member has opted out of public messaging systems including Facebook, to communicate about activities of the Club.

The personal data or any part of it may be shared with:

- Members of the Board or Committee who need it for any purposes connected with the proper management of the Club
- Any member of the Club who is responsible for arranging any activity and for which the data subject concerned has independently signed up;
- third parties such as insurers or other professional advisers to investigate or defend insurance claims or in connection with any legal proceedings;
- other third parties with a view to securing funding or professional advice or insurance – on an aggregated and anonymised basis only
- British Rowing as part of any reporting requirements either specific to an individual or an anonymised and aggregated basis. Information will be shared with British Rowing if required in order to comply with any rules, policies and procedures issued by British Rowing. Where possible such information will be provided on an aggregated and anonymised basis. However, specific reports which require the provision of data that identifies an individual, will be provided in situations where such reports must be submitted.
- Any other enforcement agency as part of any investigation being made by them;
- On the instruction of any member who wishes to participate in any British Rowing event and is not, for the time being, able to directly provide relevant information to British Rowing

The Club has adopted the use of Webcollect, to manage membership, records, and subscriptions. All personal data relating to members and their subscriptions is held on behalf of the club by Webcollect. This enables the Club hold all its membership data in one location. Administration access rights are given only to the Membership Secretary and the Treasurer. If there is any query about any member, that query may be raised by the Membership Secretary or the Treasurer with the member directly or with an appropriate committee member only for resolution directly with that member.

The Club has reviewed the privacy statement and the data protection policy of Webcollect together with its statements about the security of information and is satisfied that it meets the data protection standards required by the law and the club.

Webcollects' privacy statement and privacy policy are at this link: [Webcollect Privacy Statement](#)

Webcollects' representations about its security as at May 2018 is at this link: [Webcollect Security](#)

The terms and conditions under which this service is provided to the Club by Webcollect is at this link: [Webcollect terms & conditions](#)

The data processing agreement which is incorporated into Webcollects terms and conditions is at this link: <https://webcollect.org.uk/help-topic/data-processing-agreement>

Personal data secured through the website will also be processed in accordance with the statement set out on the Privacy statement.

Additional information may be received via the website from non-members in response to the "Contact Us" or other sections of the website inviting contact with the Club. Any data received will be treated in accordance with the statements in the Club Privacy Statement.

APPENDIX B - DIRECTOR INFORMATION

The Club is legally constituted as a company. Its statutory books are held by the Secretary in hard copy only in a secure environment which prevents access to unauthorised people. No such information is held on any electronic system. The personal information held is information about directors and officers of the Company under company law.

It will be made available to any person with a right to see it under the relevant legislation.

This information is collected and processed in order to enable the Club to comply with its statutory and other legal obligations.

APPENDIX C: SPECIAL INFORMATION

Special information is certain health information which may affect the ability of members to enjoy rowing. This information is not stored by the Club but is disclosed to coaches on a case by case basis at the sole discretion of the member. Such information may be divulged:

- (i) only to another coach responsible for supervising that rower at any rowing session; and,
- (ii) in the event of accident or injury to that person, to any first aider or medical practitioner attending at the scene; and also,
- (iii) in the event of any accident or injury, to a doctor or other medical practitioner at any health facility.

Provided that in the cases of (i) the member has specifically consented to such divulgence at the time of providing the information, and that in the cases of (ii) and (iii) the data subject is incapacitated and unable to provide the information for themselves and is otherwise unable to withdraw consent.

This information is collected and processed for the legitimate interests of the Club and for the vital interests of the data subject.

APPENDIX D - OTHER INFORMATION

The Club will collect and store minimal personal data for the purposes of and as specified in Club policies. The information will be kept at the locations stated in the relevant policies. It is likely that this information will be accessible to all Club members.

This information is collected for the legitimate interests of the Club to enable it to manage and maintain its assets and resources. This information is required to assist the Club to manage its resources effectively including utilising the particular skills of members, and to ensure compliance with British Rowing, insurance, club policy or other similar requirements and to ensure a proper recording of injuries, accidents and other incidents.

APPENDIX E OTHER INFORMATION FOR REGISTRATION WITH THIRD PARTIES

From time to time the Club may seek to register with other organisations, membership of which will bring benefits to the Club. In those circumstances details of the officers of the Company and members of the committee may require to be provided to those organisations or statutory bodies.

In such cases the Committee will first approve the Club seeking membership of any such organisation. In that event, either the Secretary or the Treasurer or as the case may be any other nominated committee member may ask for the personal data required for application to that organisation. If data additional to that held by the Club is required it will be requested at the time and will be used solely for the purposes of the application. On confirmation or refusal of registration any additional data supplied will (unless and to the extent that registration requirements compel retention) be destroyed or, if provided electronically, will be removed from the electronic records of the person dealing with the application.

Once registered if a third party holds the personal data supplied, then it will be subject to that organisations data protection policy and statements.

APPENDIX F – THIRD PARTY SERVICE PROVIDERS

The Club uses a number of third party service providers. In each case their privacy notices and policies will apply to information supplied by members to or through those service providers. The services used by the Club are:

- The Club website is hosted on a platform called Moonfruit (owned by SiteMaker Software Ltd). They provide the online e-commerce platform that allows the Club to sell membership, and other products and services. Personal Data supplied is stored through Moonfruit's data storage, databases and the general Moonfruit application. The Club has been informed that they store data on a secure server behind a firewall. <https://www.moonfruit.com/privacy-policy>
- The Club uses paypal to process online payments via its online shop: Customer's may purchase online through PayPal Inc. Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect of the information that the Club must provide to them for purchase-related transactions. For these providers, customers are recommended to read their privacy policies in order to understand the manner in which personal information will be handled by those providers. <https://www.paypal.com/uk/webapps/mpp/ua/privacy-prev>

- For on-line sales, the Club transfers data to Royal Mails Click and Drop service in order to buy postage to deliver products and orders safely and as timely as possible to customers. <https://www.royalmail.com/privacy-notice>
- There are links to Facebook and Twitter via the website together with links to Google maps, Google Calendar and You Tube. When hyperlinks on the Club website are clicked (for example but not restricted to social media, such as Facebook, Twitter etc), they may direct the user away from the Club site. The Club is not responsible for the privacy practices of other sites and encourages all who use them to read their privacy statements beforehand.

Once a user leaves the Club website or is redirected to a third-party website or application, they are no longer governed by this the Clubs, Privacy Statements, Data Protection Policy or its website's Terms of Service. Users are reminded that certain providers may be located in or have facilities that are located a different jurisdiction from the Club or the user. If users elect to proceed with a transaction that involves the services of a third-party service provider, then their information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

APPENDIX G – INFORMATION RECEIVED FROM 3RD PARTIES

From time to time the Club may receive information from 3rd parties concerned with activities in which the Club is involved, funding for club activities or generally and generally connected with the management of the Club.

Such information will be kept by the person or persons to whom it is and divulged only to those within the Club who need it for the purposes for which the information is provided.

When the purpose is complete, the information will be deleted and disposed of from Club records.

There will be no other processing of such data