

Minerva Bath Rowing Club GDPR Privacy Policy

Minerva Bath Rowing Club is a membership organisation that exists to enable our Members benefit from of the facilities of our Club.

What does this Policy cover?

We at Minerva Bath Rowing Club take your personal data seriously. This policy:

- sets out the types of personal data that we collect about you
- explains how and why we collect and use your personal data
- explains how long we keep your personal data for
- explains when, why and with who we will share your personal data;
- sets out the legal basis we have for using your personal data;
- explains the effect of refusing to provide the personal data requested;
- explains the different rights and choices you have when it comes to your personal data; and
- explains how we may contact you and how you can contact us.

What personal data do we collect about you?

We collect the information necessary to be able to manage your membership, participation in activities and safety at the Club This information includes your contact details.

We may also collect sensitive personal data about you in the form of **Health Data**, which is vital that we know in order to keep you safe and to enable us to respond appropriately to a medical emergency or in the case of an accident. We only collect sensitive personal data from you, and further process this data, where you have given your explicit consent.

If you are a nominated **Next of Kin**, we will hold contact details on you provided by a member in case of an emergency with him/her.

Where do we collect personal data about you from?

We only collect personal data

- **Directly from you.** This enables us to manage your membership activities or enquiry about membership.
- **From a third party that is connected to the Club** – in the event of a disciplinary or grievance being necessary we may need to gather relevant information about you from 3rd parties in order to progress the investigation procedure.
- **From a member who has nominated you as Next of Kin** so that we can contact you in an emergency if an incident or emergency arises.

How and why we use your personal data?

- We use your personal data to manage your membership of the Club.
- We use your data to enter you into races that you wish to take part in on behalf of the Club.
- We use your personal data such as erg scores in order to assess your suitability for squads and races.
- We use your personal data in order to manage emergencies.

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How long do we keep your personal data for?

We only retain your information for as long as is necessary for us to use your information as described above or to comply with our legal obligations. However, please be advised that we may retain some of your information after you cease to be involved with the club, for instance if this is necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will take into account factors including:

- (a) our contractual obligations and rights in relation to the information involved;
- (b) legal obligation(s) under applicable law to retain data for a certain period of time;
- (c) our legitimate interest where we have carried out a balancing test (see legal basis below);
- (d) statute of limitations under applicable law(s);
- (e) (potential) disputes;
- (f) if you have made a request to have your information deleted; and
- (g) guidelines issued by relevant data protection authorities.

Otherwise, we securely erase your information where we no longer require your information for the purposes collected.

Who do we share your personal data with?

We share your information with officers of the club such as coaches and team captains so that we can manage your participation in club events.

If you hold an official position in the Club that requires checks such as a DBS check, First Aid Certification, Coxing or Coaching qualifications that requires that we verify the information you have provided, we may share your information with *British Rowing, other UK and International Rowing Clubs, statutory authorities and certification bodies.*

We manage all membership data using Webcollect, each member has a log-in to Webcollect so that the member can manage his or her own personal data.

Where you have indicated that you wish to participate in race events either nationally or internationally we share your personal data with British Rowing and other Associations or Clubs that are managing these race events.

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What legal basis do we have for using your information?

For Members (prospective, current, past and junior members) or people making enquiries to the Club, participating in learn to row or taster days, our processing is necessary for our legitimate interests in that we need the information in order to be able to respond to your requests.

For Members and Junior Members, we may also rely on our processing being necessary to perform a contract for you, for example in managing your membership.

We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. We keep a record of these balancing tests. You have a right to and can find out more about the information in these balancing tests by contacting us using the details below.

What happens if you do not provide us with the information we request or ask that we stop processing your information?

If you do not provide the personal data necessary, or withdraw your consent for the processing of your personal data, we may not be able to manage your membership or participation in club activities.

Do we make automated decisions concerning you?

No, we do not carry out automated profiling.

Do we use Cookies to collect personal data on you?

We do not use cookies on our website.

Do we transfer your data outside the EEA?

We do not share personal data outside the EEA unless you indicate that you wish us to enter you into an international race or event. The personal data that is shared is minimal and is always shared with your prior knowledge.

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How will we contact you?

We may contact you by phone, email or social media. If you have one particular preference over another, please just let us know.

How can you contact us?

If you are unhappy with how we've handled your information, or have further questions on the processing of your personal data, contact us here: secretary@minervabathrc.org.uk

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What rights do you have in relation to the data we hold on you?

By law, you have a number of rights when it comes to your personal data. Further information and advice about your rights can be obtained from the data protection regulator in your country.

Rights	What does this mean?
1. The right to be informed	You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we're providing you with the information in this Policy.
2. The right of access	You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Policy). This is so you're aware and can check that we're using your information in accordance with data protection law.
3. The right to rectification	You are entitled to have your information corrected if it's inaccurate or incomplete.
4. The right to erasure	This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your information where there's no compelling reason for us to keep using it. This is not a general right to erasure; there are exceptions.
5. The right to restrict processing	You have rights to 'block' or suppress further use of your information. When processing is restricted, we can still store your information, but may not use it further. We keep lists of people who have asked for further use of their information to be 'blocked' to make sure the restriction is respected in future.
6. The right to data portability	You have rights to obtain and reuse your personal data for your own purposes across different services. For example, if you decide to switch to a new provider, this enables you to move, copy or transfer your information easily between our IT systems and theirs safely and securely, without affecting its usability.
7. The right to object to processing	You have the right to object to certain types of processing, including processing for direct marketing (i.e. if you no longer want to be contacted with potential opportunities).
8. The right to lodge a complaint	You have the right to lodge a complaint about the way we handle or process your personal data with your national data protection regulator.
9. The right to withdraw consent	If you have given your consent to anything we do with your personal data, you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful). This includes your right to withdraw consent to us using your personal data for marketing purposes.

We usually act on requests and provide information free of charge, but may charge a reasonable fee to cover our administrative costs of providing the information for:

- baseless or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request. Before submitting your request please consider your request responsibly bearing in mind that we are a membership organisation that is managed entirely by volunteers. We'll respond as soon as we can. Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll come back to you and let you know.