

## **DONCASTER ROWING CLUB**

### **GDPR/PRIVACY NOTICE FOR OUR MEMBERS**

We are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your membership with us. This notice applies to you if you have registered to become or are a member of our club. This notice explains how we comply with the law on data protection, what your rights are and for the purposes of data protection we will be the controller of any of your personal information that you have supplied to us.

References to **we**, **our** or **us** in this privacy notice are to Doncaster Rowing Club.

We have not appointed a Data Protection Officer to oversee our compliance with data protection laws as we are not required to do so, but our Club Captain has overall responsibility for data protection compliance in our organisation. Contact details are set out in the "Contacting us" section at the end of this privacy notice.

#### **1. PERSONAL INFORMATION WE MAY COLLECT FROM YOU**

Depending on the type of membership you register for with us, you will initially provide us with or we may obtain **personal information** about you, such as information regarding your:

- personal contact details allowing us to contact you directly such as name, title, email addresses and telephone numbers.
- date of birth allowing us to identify junior age bracket or masters classification
- Gender.
- membership start and end date.
- records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
- use of and movements through our web site, username and other IT system identifying information.
- records of your attendance at training and races as Doncaster Rowing Club or Doncaster Schools Rowing Association.
- 'Live only' camera footage from the Doncaster Rowing Club video camera mounted on the Southern elevation of the Boathouse.
- details of emergency contacts.
- records of training performance, race attendance and results.
- Swimming ability.

#### **2. SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect and store the following "**special categories**" of more sensitive personal information regarding you:

- information about your health, including any medical condition which you informed us of on your membership application or subsequently, you should consider sharing this information with your coach and crew if appropriate for your own and your crewmates safety.

We do so on the basis that

- it is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of rowing safety.
- based on your explicit consent.

In the table below' we refer to these as the "special category reasons for processing of your personal data".

#### **3. WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members when you apply to become a member of the club or when you correspond with us by phone, e-mail or in some other way.

We also may collect personal information about you from British Rowing if you enter British Rowing regulated races.

If you are providing us with details of emergency contacts they have a right to know and to be aware of what personal information we hold about them, how we collect it and how we use that information. Please share this privacy notice with those of them whom you feel are sufficiently mature to understand it. They also have the same rights as set out in the “**Your rights in relation to personal information**” section below.

#### 4. USES MADE OF THE INFORMATION

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do this.

Purpose	Personal information used	Lawful basis
<b>To administer any membership, you have with us and managing our relationship with you.</b>	All contact and membership details, transaction and payment information, records of your interactions with us.	This is necessary to enable us to properly manage and administer your membership with us.
<b>To send you information about the club’s organisation, competitions, events and updates on rowing.</b>	Contact and membership details.	This is necessary to enable us to communicate club information effectively.
<b>To send you information which you request from us or which we believe you might find useful.</b>	Contact and membership details.	This is necessary to enable us to communicate club information effectively.
<b>To answer queries or complaints</b>	Contact details and records of your interactions with us	We have a legitimate interest to provide answers to queries or complaints in case there are any issues with your membership.
<b>Retention of records</b>	All the personal information we collect	We have a legitimate interest in retaining records whilst they may be required to properly administer and manage your membership and run our club.  We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>The security of our IT.</b>	Your usage of our website and WhatsApp groups.	We have a legitimate interest to ensure that our IT systems are secure.
<b>To conduct performance analysis to better understand your progress within the sport.</b>	Records of your ERG scores and race times.	We have a legitimate interest in doing so to facilitate athlete progress.
<b>For the purpose of promoting the club, our events and membership.</b>	Images in video and / or photographic form.	Only where you have given explicit consent to do so.

<b>To comply with health and safety requirements</b>	Records of attendance and medical information you supplied on your membership form.	We have a legal obligation and a legitimate interest to provide you and other members of our organisation with a safe environment in which to participate in sport.  We record special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To administer your attendance at any races or programmes you sign up to</b>	All contact and membership details.  Details of performance data.	This is necessary to enable us to register you on to and properly manage and administer your attendance at races and/or programmes.
<b>To use information about your physical health (including any injuries) or disability status, to ensure your health and safety and to assess your fitness to participate in any events or activities we host and to provide appropriate adjustments to our sports facilities.</b>	Health and medical information	We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To gather evidence for investigation of incidents or accidents.</b>	All the personal information we collect	We have a legitimate interest in doing so to provide a safe and fair environment for all members and to ensure the effective management of any incidents or accidents.  We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>For the purposes of equal opportunities monitoring</b>	Name, title, date of birth gender, information about your race or ethnicity and health and medical information	We have a legitimate interest to promote a sports environment that is inclusive, fair and accessible.  We process special category personal data based on the “special category reasons for processing of your personal data” referred to in section 2 above.
<b>To comply with legal obligations, for example, regarding people working with children or vulnerable adults to comply with our safeguarding requirements</b>	Members working with children or vulnerable adults, information about your criminal convictions and offences.	For criminal records history we process it on the basis of legal obligations or based on your explicit consent.
<b>Left blank intentionally</b>		

For some of your personal information you will have a health and safety obligation for you to provide us with your information. If you do not provide us with the requested personal information, we may not be able to admit you as a member or we may have to terminate your membership. For other personal information you

may not be under an obligation to provide it to us, but if you do not provide it then we may not be able to properly perform our responsibilities to you.

Where you have given us your consent to use your personal information in a particular manner, you have the right to withdraw this consent at any time, which you may do by contacting us as described in the "Contacting us" section below.

Please note however that the withdrawal of your consent will not affect any use of the data made before you withdrew your consent, and we may still be entitled to hold and process the relevant personal information to the extent that we are entitled to do so on bases other than your consent. Withdrawing consent may also have the same effects as not providing the information in the first place, for example we may no longer be able to provide certain member benefits to you.

## 5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- **Any party explicitly approved by you.**
- **To any governing bodies or regional bodies for the sports covered by our club:** to allow them to properly administer the sports on a local, regional, and national level.
- **Police, law enforcement and security services:** to assist with the investigation and prevention of crime and the protection of national security.

## 6. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

The duration for which we retain your personal information will differ depending on the type of information and the reason why we collected it from you. However, in some cases personal information may be retained on a long-term basis: for example, personal information that we need to retain for legal purposes will normally be retained in accordance with usual commercial practice and regulatory requirements. Generally, where there is no legal requirement, we retain all physical and electronic records for a period one year after your last contact with us or the end of your membership. Exceptions to this rule are:

- Details regarding unsuccessful membership applicants where we hold records for a period of not more than three months.
- Information that may be relevant to personal injury or discrimination claims may be retained until the limitation period for those types of claims has expired. For personal injury or discrimination claims this can be an extended period as the limitation period might not start to run until a long time after the event.

It is important to ensure that the personal information we hold about you is accurate and up-to-date, and you should let us know if anything changes, for example if you change your phone number or email address. You may be able to update some of the personal information we hold about you by contacting the membership secretary alternatively, you can contact us by using the details set out in the "**Contacting us**" section below.

## 7. **YOUR RIGHTS IN RELATION TO PERSONAL INFORMATION**

You have the following rights in relation to your personal information:

- the right to be informed about how your personal information is being used;
- the right to access the personal information we hold about you;
- the right to request the correction of inaccurate personal information we hold about you;
- the right to request the erasure of your personal information in certain limited circumstance.

Whilst this privacy notice sets out a general summary of your legal rights in respect of personal information, this is a very complex area of law. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below.

If you are unhappy with the way we are using your personal information you can also complain to the UK Information Commissioner's Office or your local data protection regulator. We are here to help and encourage you to contact us to resolve your complaint first.

8. **CHANGES TO THIS NOTICE**

We may update this privacy notice from time to time. When we change this notice in a material way, we will update the version date at the bottom of this page. For significant changes to this notice we will try to give you reasonable notice unless we are prevented from doing so. Where required by law we will seek your consent to changes in the way we use your personal information.

9. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email DRC Club Captain at [edbradley@hotmail.com](mailto:edbradley@hotmail.com)

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