



# Member Privacy Policy

Revision V4.0

Last revised: November 2024

Manvers Waterfront Boat Club (MWBC) are committed to respecting your privacy. This notice is to explain how we may use personal information we collect before, during and after your time as a member of MWBC. This notice explains how we comply with the law on data protection and what your rights are in relation to your personal data. For the purposes of the data protection law, we will be the “controller” of your personal information in relation to your membership of MWBC.

This notice applies to you whatever section of MWBC you have membership with.

References to **we**, **our** or **us** in this privacy notice are to MWBC, whose registered office is at The Boat House, Station Road, Wath Upon Dearne, Rotherham S63 7DG

We are registered with the Information Commissioner's Office (with the registration number ZA665057) and have appointed a Data Protection Officer to oversee our compliance with data protection laws in our organisation. Contact details of the Data Protection Officer are set out in the "**Contacting us**" section at the end of this privacy notice.

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

When you sign up for membership with us, you may provide us with or we may obtain **personal information** about you, such as:

- Your personal contact details that allows us to contact you directly such as name, title, email addresses and telephone numbers.
- Your date of birth.
- Your gender.
- Your membership details including start and end date.
- Records of your interactions with us such as telephone conversations, emails and other correspondence and your instructions to us.
- Any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you.
- Your use of and movements through our online portal, passwords, personal identification numbers, IP addresses, usernames and other IT system identifying information.
- Any disciplinary and grievance information.
- Details of your next of kin, family members, and emergency contacts.
- Records of your attendance at any events, courses and/or competitions hosted by us.
- Details pertaining to the application, prevention, detection, compliance with, investigation, or enforcement of regulations and governance, including any breaches of any applicable Regulations or Codes of Conduct.
- Images of you at events and/or competitions in video and/or photographic form and voice recordings; and
- Your marketing preferences so that we know whether and how we should contact you.

## **SPECIAL CATEGORIES OF PERSONAL INFORMATION**

We may also collect, store and use the following “**special categories**” of more sensitive personal information regarding you:

- Information about your race or ethnicity, religious beliefs and sexual orientation; and information about your health, including any medical condition, health and sickness records, medical records and health professional information;
- Information about criminal convictions and offences, including information that may be disclosed by the disclosure and barring service.

We may not collect all of the above types of special category personal information about you but in relation to the special category personal data that we do process, we do so on the basis that:

- The processing is necessary for reasons of substantial public interest, on a lawful basis as set out in Schedule 1, Part 2 of the Data Protection Act 2018 which includes where processing is necessary for:
  - the safeguarding of children and individuals at risk;
  - protecting the public;
  - anti-doping in sport; or
  - maintaining standards of behaviour in sport.
- It is necessary for the establishment, exercise or defence of legal claims;
- It is necessary for the purposes of carrying out the obligations and exercising our or your rights in the field of employment and social security and social protection law;
- or based on your explicit consent.

Where you have given us consent, we may also collect and process collect personal data relating to diversity, inclusion and disability for monitoring purposes and to allow us to better identify and improve engagement with minority groups, identify the reduction in engagement in certain groups as they grow older and to provide associated reports to key selected partners.

In the table below, we refer to the reasons detailed above as the “special category reasons for processing of your personal data”.

## WHERE WE COLLECT YOUR INFORMATION

We typically collect personal information about our members when you become a member of MWBC; when you purchase any services or products we offer online.

When you make a query and/or complaint or when you correspond with us by telephone, Email or in some other way. Where you are registered through an affiliated club, they may collect your details and pass them to us. You may also choose to provide us with other information on your online membership profile.

If you are providing us with details of next of kin, family members and 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 and may share that information. Please share this privacy notice with those of whom you deem it appropriate. They also have the same rights as you do and as are set out in the “**Your rights in relation to personal information**” section below.

## 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>All Members</b>		
To administer any membership account(s) you have with us and managing our relationship with you, including arranging for any insurance and licences and dealing with payments and any	All contact and membership details, transaction and payment information,	This is necessary to enable us to properly manage and administer your

support, service or product enquiries made by you.	records of your interactions with us.	membership contract with us.
To arrange and manage any contracts for the provision of any merchandise, products and/or services.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly administer and perform any contract for the provision of merchandise/products/services.
To send you information which is included within your membership benefits package, including details about meetings and training opportunities.	All contact and membership details. Transaction and payment information.	This is necessary to enable us to properly manage and administer your membership contract with us.
To answer your queries or complaints.	Contact details and records of your interactions with us.	We have a legitimate interest to provide complaint handling services to you in case there are any issues with your membership.
Retention of records.	All the personal information we collect.	We have a legitimate interest in retaining records whilst they may be required in relation to complaints, disciplinary and safeguarding matters or legal claims. We need to retain records in order to properly administer and manage your membership and in some cases, we may have legal or regulatory obligations to retain records. We process special category personal data on the basis of the “special category reasons for processing of your personal data” referred to in the section above. We process special category personal data on the basis of the “special category reasons for processing of your personal data”

		referred to in the section above.
The security of our IT systems	Your usage of our IT systems and online portal portals	We have a legitimate interest to ensure that our IT systems are secure.
To conduct data analytics studies, membership surveys, and insight projects to better understand your participation preferences, event attendance and trends within the sport.	All contact and membership details, your responses to surveys and insight projects. Records of your attendance at any events or competitions hosted by us.	We have a legitimate interest in doing so to ensure that our membership is targeted and relevant.
For the purposes of promoting the sport, our events and membership packages.	Images in video and/or photographic form.	Where you have given us your explicit consent to do so.
To comply with health and safety requirements.	Records of attendance.	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.

For some of your personal information there will be a legal, contractual or other requirement or obligation for you to provide us with your personal 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 not be able to properly perform our contract with you or comply with legal obligations and as such we may have to terminate your position as a member. 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 contract with 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.

## **MEMBERSHIP COMMUNICATIONS & DIRECT MARKETING**

As part of your Membership, we may contact you by email or SMS with important service or administrative messages which are necessary for the fulfilment of our contract with you. Where this information is necessary for the fulfilment of our contract with you, it will not be possible to opt out of these service or administrative messages whilst remaining a member.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We may share personal information with the following parties:

- Any party approved by you.
- To any Discipline Committees, Regional bodies, or International bodies for the National Governing Bodies of sports included at MWBC: to allow them to properly administer the sports on a local, regional, national and International level.
- The Sports Councils (such as UK Sport and Sport England): where this is necessary for the administration of the sport, where your personal data is included in any images or videos taken by us at our competitions and events for promotional and journalistic purposes, or where we are required to report equality, diversity and inclusion data to them.
- Police, law enforcement and security services: to assist with the investigation and prevention of crime and the protection of national security.

Where we do share personal information with any of the third parties detailed above, we will only share such personal information as is necessary and proportionate to the specific purposes and will take appropriate steps to ensure the data is processed and shared securely with appropriate organisational and technical measures in place. We do not disclose personal information to anyone else except as set out above or in any of our other Privacy Notices that apply to you.

### **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. Full details of how long we retain different categories of data can be found in our Data Retention Policy.

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 will be able to update some of the personal information we hold about you through Webcollect.

### **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 circumstances;
- The right to restrict processing of your personal information where certain requirements are met;
- The right to object to the processing of your personal information;
- The right to request that we transfer elements of your data either to you or another service provider; and
- The right to object to certain automated decision-making processes using your personal information.

You should note that some of these rights, for example the right to require us to transfer your data to another service provider or the right to object to automated decision making are not absolute and may not apply as there are specific requirements and exemptions which apply to

them and they may not apply to personal information recorded and stored by us. For example, we do not use automated decision making in relation to your personal data. However, some have no conditions attached, so your right to withdraw consent or object to processing for direct marketing are absolute rights.

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/>.

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

## **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 on the title 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.

## **CONTACTING US**

Chris Wordsworth is the Data Protection Officer. In the event of any query or complaint in connection with the information we hold about you, please email him at [GDPR@mwbc.org.uk](mailto:GDPR@mwbc.org.uk).