



BLACK ROCKS ROWING CLUB
DATA PRIVACY POLICY

Revision: 2.0

Adopted: 12/08/2021

Black Rocks Rowing Club

REVISION HISTORY

Revision Number	Nature of Revision	Date of Adoption
1.0	First release.	03/10/19
1.1	Review of policy conducted. Revisions capture changes to regulations following UK departure from EU, updates to personal information collected by BRRC, and additional considerations due to establishment of a club website.	12/08/21

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ACRONYMS

BRRC	Black Rocks Rowing Club
EU	European Union
GDPR	General Data Protection Regulation
ICO	Information Commissioner’s Office
SCRA	Scottish Coastal Rowing Association
SASA	St Ayles Skiff International
UK	United Kingdom

1 GENERAL

1.1 About This Policy

- 1.1.1 This policy explains when and why we collect personal information, how we use it, how we keep it secure, and your rights in relation to it.
- 1.1.2 We may collect, use and store your personal data as described in this Data Privacy Policy.
- 1.1.3 We reserve the right to amend this Data Privacy Policy from time to time without prior notice.
- 1.1.4 Please note that the EU GDPR is an EU Regulation and no longer applies to the UK. However, GDPR has been incorporated into UK data protection law as the UK GDPR – so in practice there is little change to the core data protection principles, rights and obligations found in the UK GDPR. We will always comply with UK data protection law when dealing with your personal data. Further details can be found at the website for the Information Commissioner (www.ico.org.uk).

1.2 Who Are We?

- 1.2.1 We are Black Rocks Rowing Club (BRRC).
- 1.2.2 Our website address is <https://www.burntislandrowing.org.uk>
- 1.2.3 We can be contacted through the website above or using one of the following e-mail addresses:
 - Club Secretary: brrowing.secretary@gmail.com
 - Membership Secretary: brrowing.membership@gmail.com
 - Webmaster: brrowing.webmaster@gmail.com
- 1.2.4 For the purposes of GDPR, we will be the ‘controller’ of all personal data we hold about you. A ‘Lead Data Controller’ will be nominated by the Committee from the club membership.

2 DATA COLLECTION

2.1 What Information We Collect and Why

Type of Information	Purpose(s)	Legal Basis of Processing
2.1.1 Member's name, address, telephone numbers, e-mail address, etc	Managing the Member's membership of BRRC. Keeping in touch with the Member (including by newsletter).	Performing BRRC's contract with the Member. For the purposes of our legitimate interests in operating the club.
2.1.2 The names of the Member's dependants	Managing the Member's and their dependants' membership of BRRC.	Performing BRRC's contract with the Member.
2.1.3 The names and contact details of a Member's parent(s)/guardian(s), if the Member is aged under 16	Managing the Member's membership of BRRC. Keeping in touch with parent(s)/guardian(s) and obtaining consent where required. Upholding BRRC's child protection and safeguarding responsibilities.	Protecting the Member's vital interests.
2.1.4 Emergency contact details	Contacting next of kin in the event of an emergency.	Protecting the Member's vital interests and those of their dependents.
2.1.5 Member's date of birth / age-related information	Managing membership categories which are age-related. Managing race or event entries that are age-related.	Performing BRRC's contract with the Member.
2.1.6 Member's gender	Managing race or event categories which are gender-related. Provision of adequate facilities for Members. Reporting information to regulatory or other bodies required by law to maintain diversity data required by Sports Councils.	For the purposes of our legitimate interests in making sure that we can provide sufficient and suitable facilities (including changing rooms and toilet facilities) for each gender. For the purposes of the legitimate interests of regulatory or funding bodies or as otherwise required by law.

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Type of Information	Purpose(s)	Legal Basis of Processing
2.1.7 Member's/non-member's name and boat name	<p>Managing race entries and race results.</p> <p>Publishing race results at the club and with other clubs, class associations, the SCRA, SASI, and providing race results to local and national media.</p>	<p>For the purposes of our legitimate interests in holding races for the benefit of members of BRRC.</p> <p>For the purposes of our legitimate interests in promoting BRRC.</p>
2.1.8 Photos and videos of Members and their boats.	Putting on the BRRC website, social media pages, newsletter and using in press releases.	We will seek the Member's consent on their Membership Application Form. The Member may withdraw their consent at any time by contacting the Secretary by e-mail or letter.
2.1.9 Security camera images.	Safety and crime prevention/detection.	For the safety of Members and visitors and to deter or detect crime.
2.1.10 Bank account details of the Member or other person making payment to BRRC.	<p>Managing the Member's and their dependents' subscription to BRRC.</p> <p>Refunding the Member for purchases made on behalf of the club.</p> <p>The provision of services and events.</p>	<p>Performing BRRC's contract with the Member.</p> <p>For the purposes of our legitimate interests in operating the club.</p>
2.1.11 Name, e-mail address and telephone number of each Club Officer.	Information published on the BRRC website, newsletter, marketing materials and other publications; made available to the SCRA, SASI or other clubs/associations; provided as required in applications for funding, grants or corporate membership of other bodies; in each case as a point of contact at the club.	For the purposes of our legitimate interests in operating and promoting BRRC.

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Type of Information	Purpose(s)	Legal Basis of Processing
2.1.12 Name, e-mail address and telephone number of external parties.	Managing attendance at events hosted by the SCRA, SASI or other clubs/associations; organisation of events hosted by BRRC; collaboration with external parties; applications for funding, grants or corporate membership of other bodies; in each case as a point of contact at the club/organisation.	For the purposes of our legitimate interests in operating BRRC.
2.1.13 Medical declarations provided by the Member.	Ensuring that BRRC processes, equipment and risk assessments are adequate and capture the requirements of all Members.	For the safety of Members and non-members.
2.1.14 Audio/audio-video recordings of club meetings.	Assisting the Secretary (or his/her representative) in producing written minutes of the meeting.	We will seek the consent of all individuals attending a meeting prior to recording it.
2.1.15 Names of meeting attendees.	Providing a list of attendees at club meetings which will be recorded in formal minutes and uploaded to the club website.	For the purposes of our legitimate interests in operating the club.

2.2 Website

2.2.1 When you submit a message through our Contact Form, we ask you to provide us with personal information that can be used to contact or identify you. We use this information to enable us to respond to your query.

2.2.2 Articles on the BRRC site may include embedded content (e.g. videos, images, articles, etc.). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

2.2.3 We do not use Google Analytics, Webalizer, Matomo or any similar data gathering and analysis service/software.

2.2.4 Minutes from club meetings (including Annual General Meetings, Extraordinary General Meetings and Committee Meetings) are publically accessible through the club website. These minutes include a list of attendees but no other personal details will be routinely published in this manner.

3 DATA HANDLING

3.1 How we Store your Personal Data

- 3.1.1 The personal data that you provide when you complete a Membership form is stored using Google Drive; this includes your name, contact details, date of birth, gender and medical disclosures.
- 3.1.2 Google Drive is an online cloud-based storage system. We retain ownership of the information and control the access rights as per the Terms of Service, which can be viewed here: <https://www.google.com/drive/terms-of-service/>

3.2 How we Protect your Personal Data

- 3.2.1 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.
- 3.2.2 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:
- a) as set out in Section 2 above
 - b) to comply with a legal obligation
 - c) to protect or defend our rights or property
- 3.2.3 The security of your data is important to us, but remember that no method of transmission over the internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.
- 3.2.4 For any payments which we take from you online we will use a recognised online secure payment system.
- 3.2.5 We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

3.3 Who has Access to the Information you Provide

- 3.3.1 Personal information stored on Google Drive will be protected such that it may only be accessed through approved password-protected accounts held by the following Committee Members:
- a) Lead Data Controller (read/write access)
 - b) Chair (read access)
 - c) Secretary (read access)
 - d) Membership Secretary (read/write access)
- 3.3.2 Personal information held by BRRC may be divulged to Members or non-members who have a legitimate need to use it under the terms of this policy for the purposes described in Section 2.1.

3.3.3 Medical disclosures are recognised as being particularly sensitive in nature. Where this information must be shared outwith the individuals listed in 3.3.1 (e.g. when the Health & Safety Officer undertakes risk assessments), this information will be anonymised.

Note: As medical details are not shared with the wider membership of the club, it is the responsibility of individual Members to notify the cox and/or person in charge of any relevant medical conditions prior to participation in a club activity.

3.4 How Long we Keep your Information

3.4.1 We will hold your personal data on our systems for as long as you are a Member of BRRC and for as long afterwards as it is in BRRC's legitimate interest to do so or for as long 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 except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations (e.g. compliance with tax requirements and exemptions and the establishment, exercise or defence of legal claims).

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

3.4.3 We will hold security camera images/videos for no longer than one month except where there is a legal reason to do so. In those circumstances, we will only retain those images for the minimum period necessary.

3.5 Your Rights Explained

3.5.1 It is important that you understand what rights you have in respect of the Personal Data and Special Category Personal Data that we hold about you. To let us know that you wish us to exercise any of your rights outlined above please contact our nominated Club Member.

3.5.2 Your rights are summarised below. For further information on each of those rights, including the circumstances in which they apply, please see the guidance from the Information Commissioner's Office (ICO) on individuals' rights under the UK General Data Protection Regulation.

a) **The right to be informed (knowing how we will use your data).**

You have the right to be told how we will use your Personal Data – which is set out in this Policy.

b) **The right of access (being provided with copies of your data).**

You have the right to ask us to provide you with a copy of your Personal Data. We will supply you with any information which we hold about you as soon as possible but may take up to 1 month once we are satisfied as to your identity. We will not charge you for this. This is called a 'data subject access request'.

c) **The right to rectification (changing incorrect information we hold).**

If you believe our records are inaccurate you have the right to ask for those records concerning you to be updated. Contact details for any requests can be found above.

- d) **The right to be forgotten (erasure) (requesting deletion of your Personal Data).**
In some cases, you have the right to be forgotten (i.e. to have your Personal Data deleted from our database).
- e) **The right to restrict processing (limiting how we use your data).**
In certain situations you have the right to ask for processing of your Personal Data to be restricted because there is some disagreement about its accuracy or legitimate usage.
- f) **The right to data portability (moving your data in a useable format).**
You have the right to request the Personal Data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party - in certain situations.
- g) **The right to object (when we must stop processing your data).**
You have the right to object to us processing data purely for our legitimate interests. If you make such a request, we must stop processing your Personal Data unless: we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or the processing is for the establishment, exercise or defence of legal claims.
- h) **The right not to be subject to automated decision making including profiling (making a decision solely by automated means without any human involvement).**
The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you. Black Rocks Rowing Club does not undertake automated decision making or profiling.

3.5.3 You have the right to take any complaints about how we process your personal data to the Information Commissioner:

<https://ico.org.uk/about-the-ico/who-we-are/scotland-office/>

0303 123 1115

Information Commissioner's Office – Scotland
Queen Elizabeth House
Sibbald Walk
Edinburgh
EH3 7HL