



## UTRC DATA PROTECTION POLICY - GDPR (General Data Protection Regulation)

Date: 9<sup>th</sup> May 2018

### Introduction:

Upper Thames Rowing Club needs to gather and use certain information about individuals.

These individuals can include competitors/coaches as well as information relating to suppliers, contractors, volunteers, officials and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the Company's Data Protection standards and to comply with the law.

### Why this policy exists:

This data protection policy ensures that Upper Thames Rowing Club:

- Complies with data protection law and follows good practice.
- Protects the rights of volunteers, athletes and partners.
- Is open about how it stores and processes individuals' data.
- Protects itself from the risk of a data breach.

### Data Protection Law:

The Data Protection Act 1998 describes how all organisations including Upper Thames Rowing Club must collect, handle and store personal information. The requirements of the Act are supplemented by the GDPR coming into effect on 25<sup>th</sup> May 2018.

These rules must 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.

The Data Protection Act is underpinned by eight important principles. These say that personal data must be:

1. Processed fairly and lawfully.
2. Obtained only for specific lawful purposes.
3. Be accurate, relevant and not excessive.
4. Be accurate and kept up to date.
5. Not be held for any longer than necessary.
6. Processed in accordance with the rights of data subjects.
7. Be protected in appropriate ways.
8. Not be transferred outside the European Union unless that country or territory also ensures an adequate level of data protection.

### People, Risks and Responsibilities:

#### Policy Scope:

This policy applies to

- The Committee of Upper Thames Rowing Club.
- The membership and volunteers of Upper Thames Rowing Club.

- All contractors, suppliers and other people working on behalf of Upper Thames Rowing Club. It applies to all personal data that the club holds relating to identifiable individual people even if that information technically falls outside the Data Protection Act.

This data can include:

- Names of individuals.
- Postal address.
- Email address.
- Telephone number.
- A photograph of the individual.
- Bank or credit card details.
- Medical information.
- Plus any other information relating to an identifiable individual.

#### **Data Protection Risks:**

This policy opts to protect Upper Thames Rowing Club from 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 company uses data relating to them.
- Reputational damage – the company could suffer if hacker successfully gained access to sensitive data.

#### **Responsibilities:**

Everyone who works for or with Upper Thames Rowing Club either voluntarily or for payment has some responsibility for ensuring data is collected, stored and handled appropriately.

In addition each sub group or area of operation within UTRC that handles personal data must ensure that it is handled and processed in line with this policy and that data protection principles are applied.

The following people have key areas of responsibility:

- The Committee is ultimately responsible for ensuring that UTRC meets its legal obligations.
- Due to the nature of the organisation and its size there is no individual named specifically as a Data Protection Officer.
- Although key individuals in UTRC will “process” data controlled by UTRC, each individual head of respective sub groups within UTRC (i.e. competition, membership) is responsible for keeping the UTRC Committee updated about data protection responsibilities, risks and issues and reviewing data protection procedures in their area of operation and to ensure that people they are working with are aware of this policy and given appropriate training or instruction.
- Liaison will be required with those key individuals processing data for UTRC to ensure that any computer services and equipment used for storing data meet acceptable security standards and that regular checks are performed to ensure software is functioning correctly

#### **General Guidelines:**

- The only people able to access data covered by this policy should be those who need it for their work. Data Processors should not retain data on any unencrypted device or share it with others outside of on a system approved by UTRC.
- Data should not be shared informally and should only be retained by UTRC Data Processors who must be approved/authorised by the Committee.
- Notwithstanding the above, all volunteers within UTRC should be required to keep any personal data secure by taking sensible precautions and following these guidelines:

- Data should only be stored on the UTRC system operated by approved Data Processors.
- Conversely personal data should not be transmitted in an unencrypted or insecure format including via email to other members of the club.
- Anyone within UTRC who have any concerns about the procedures for storage, or use of personal data or who suspect that data might have been compromised, must immediately alert the UTRC Data Processors and a member of the Committee.

#### **Data Storage:**

These rules describe how and where data should be safely stored.

- When data is stored on paper it should be kept in a secure / locked place where unauthorised people cannot see it or access it.
- Paper printouts should not be left where unauthorised people could see them
- Data printouts should be shredded and disposed of securely when no longer required.
- When data is secured electronically it must be protected from unauthorised access, accidental deletion and malicious hacking attempts. If any data is temporarily stored on removable media (such as CD or DVD) for effective operation of the Club, these should be kept locked away securely when not being used and should be wiped deleted or destroyed when no longer required.

#### **Data Use:**

- No data relating to an identifiable individual should be used by any member of UTRC for any purposes other than that directly related to the operation of the Club or, its related activities. For example it would be inappropriate to use an email address to contact someone for personal reasons unrelated to an event or information transfer related to Club activities.
- Personal data should not be shared informally. In particular it should never be sent by email and a classic error to be avoided is mass emails where the entire recipients can be seen in the address bar rather than using the bcc bar.
- Volunteers should not save copies of any UTRC data onto their personal devices such as tablets, phone or laptops that have not been approved for such use by UTRC committee.
- Communication using personal email addresses between members of UTRC is permissible provided the members have consented to such use and provided the data is not shared outside of UTRC.

#### **Data Accuracy:**

The law requires that UTRC takes reasonable steps to ensure that data is kept accurate and up to date.

It is the responsibility of all volunteers who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data should be held only by persons designated as UTRC Data Processors.
- Every opportunity should be taken to ensure data is updated. For example by confirming an individual's data is correct when they call or visit.
- Data should be updated as soon as inaccuracies are discovered. For instance if an individual can no longer be reached on their stored telephone number or email address it should be removed from the database and anyone within UTRC who might have similar data should equally be advised and updated.

### **Subject Access Requests:**

All individuals who are the subject of personal data being held by Upper Thames Rowing Club are entitled to:

- Ask what information UTRC 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 company is meeting its data protection obligations.

If an individual contacts UTRC requesting this information this is called a subject access request.

Subject access requests from individuals should be made by email addressed to the head of the appropriate sub group within the Committee or to the Chairman of UTRC at [chairman@utrc.org.uk](mailto:chairman@utrc.org.uk)

The recipient of a subject access request will aim to provide the relevant data within 14 days of receipt of the request. However, before doing so, UTRC must 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 Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances UTRC will disclose requested data, however the relevant Data Processor will ensure the request is legitimate, seeking assistance from the Committee and legal advisors if necessary.

### **Providing Information:**

Upper Thames Rowing Club aims to ensure that all individuals are aware that their data is being processed and that they understand:

- How the data is being used.
- How to exercise their rights.
- That the data will not be disclosed to any third party nor sold for marketing purposes. Under the principles of GDPR, UTRC will provide clear access to its privacy policy. The privacy policy will be stated expressly on the UTRC website via a prominent link.
- UTRC will not adopt the principle of implied consent using pre ticked boxes on websites and apps. Conversely where applicable, individuals will have to consciously opt in to give consent for use of their data.
- All members will be deemed to have subscribed to the receipt of information re the running of the Club unless expressly requested.

To this end the club will use the following privacy statement setting out how data relating to individuals is used by UTRC.

**Privacy Statement** This is also on our website ([www.utrc.org.uk/privacy-statement](http://www.utrc.org.uk/privacy-statement) )

This privacy statement sets out how Upper Thames Rowing Club uses and protects any information that you give UTRC or when you use the UTRC website.

UTRC is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement for the purposes of effective running of Upper Thames Rowing Club & its events.

Upper Thames Rowing Club may change this policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This policy is effective from 25 May 2018.

#### **What we collect:**

We may collect the following information:

- Name and contact information including email address.
- Demographic information such as postcode, preferences and interests.
- Other information relevant to customer surveys.

#### **What we do with the information we gather:**

We require this information to process our sporting club and to better understand your needs and to provide you with a better service, and specifically for the following reasons:

- Internal record keeping.
- Sharing of safety information
- Updates relating to Rowing, Social or Organisational activities relating to the Club or its Events
- Organise officials and volunteers duties and rotas.
- We may also use your information to contact you for research purposes to improve the running of the Club and may contact you by email, phone, fax or social media.
- We will never disclose your personal information to third parties nor sell your data to any other organisation without first seeking your personal and informed consent before doing so.

#### **Security:**

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable, physical, electronic and managerial procedures to safeguard and secure the information we collect.

#### **How we use cookies:**

A cookie is a small file which asks permission to be placed on your computers hard drive. Once you agree, (by clicking on the message in our website) the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular website. Cookies allow web applications to respond to you as an individual. A web application can tailor its operation to your needs by gathering and remembering information about your preferences.

We use traffic log cookies to identify which pages are being used. This helps our website administrators analyse data about webpage traffic and to improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system. A cookie does not give us access to your computer or any information about you other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies but you can usually modify your browser setting to decline cookies if you prefer.

#### **Links to other websites:**

Our website may contain links to other websites of interest. However once you have used these links to leave our site, you should note that we do not have any control over that third party website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

**Controlling your personal information:**

You may choose to restrict the collection or use of your personal information in the following ways:

- Whenever you are asked to fill in a form on the website look for a box requiring you to indicate that you consent for the information to be used by anybody for direct marketing purposes. If this is not ticked by you, it will not be shared for that direct marketing activity.
- If you have previously agreed to us using your personal information for direct marketing, you may change your mind at any time by giving us notification in writing or by emailing UTRC.

We will not sell, distribute or lease your personal information to third parties without your prior permission.

You may request details of personal information which we hold about you under the Data Protection Act 1998. Such requests can be made to the Chairman of UTRC at [chairman@utrc.org.uk](mailto:chairman@utrc.org.uk)  
Or [secretary@utrc.org.uk](mailto:secretary@utrc.org.uk)

If you believe that any information we are holding on you is incorrect or incomplete, please write or email UTRC as soon as possible and we will promptly correct any information found to be incorrect.

**Abbreviated Privacy Statement**

*UTRC respects everyone's privacy and will never sell, share or disclose your data to a third party without your express consent. We only retain data that is necessary for the effective operation of the membership and events. You may request to be removed from any database we retain or request details of any information UTRC holds on you via our full Privacy Policy on our website.*