

ST ALBANS SUB-AQUA CLUB LTD

PRIVACY POLICY



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1. INTRODUCTION

We are committed to respecting your privacy. This policy sets out how we may use personal information we collect before, during and after your membership with us. This policy applies to you if you have registered to become or are a member of our club, or if you have subscribed to our announcements newsletter (CyberCrud). It explains how we comply with the law on data protection, and what your rights are. For the purposes of data protection, we will be the controller of any of your personal information.

References to **SASAC**, The **Club**, **we**, **our** or **us** in this privacy notice are to **St Albans Sub-Aqua Club Ltd** registered in England No 1569822, a company limited by guarantee.

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 the directors have overall responsibility for data protection compliance in our organisation.

2. PERSONAL INFORMATION WE MAY COLLECT FROM YOU AND WHAT WE USE IF FOR

You may initially provide us with or we may obtain, the following **personal information** about you. The table below describes the main purposes for which we process this personal information.

Personal Information	Use
personal contact details such as name, title, email addresses and telephone numbers;	to enable us to contact you directly. This is necessary to enable us to properly manage and administer your membership contract with us.
email address (only)	for CyberCrud (the club's newsletter), unless unsubscribed
date of birth;	to ascertain voting entitlements, concessionary rates and eligibility for certain courses
gender;	for statistical purposes only
membership start and end date;	for membership administration
names and ages of members' children	to enable us to properly manage family memberships
records of your diving, snorkelling, swimming, or associated qualifications.	to ascertain eligibility or suitability for certain courses or activities, and as a service to members who may have lost their own qualification records.
information obtained through electronic means such as key fob records;	to administer and control the club's electronic access control system
images in video and/or photographic form and voice recordings;	for publicity and general entertainment purposes, although consent will be requested if practicable
details of next of kin, family members, coaches and emergency contacts, but please obtain their consent first.	for emergency use only
any disciplinary and grievance information;	for disciplinary or grievance purposes only

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.

However, some of your personal information we ask you for will be necessary in order to administer your membership. If you do not provide us with the requested personal information, or if you withdraw your consent to use your information, we may not be able to admit you as a member or we may have to terminate your membership.

3. **WHERE WE COLLECT YOUR INFORMATION**

We typically collect personal information about our members via our membership application form completed by members at the point of joining the club, or when you subscribe to our newsletter (CyberCrud).

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 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.

If you are unhappy with the application form please contact us using the details below.

4. **DIRECT CONTACT WITH MEMBERS**

From time to time, but only when necessary, we may contact you by email, post or SMS with formal notices, changes to rules and regulations, health and safety information, renewal advice, or any other information that we consider necessary to send to all club members. This is a condition of membership, and it is not possible to opt out.

5. **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We share personal information with the following parties:

- Any party approved by you.
- Other club members: as authorised collectively by members themselves. For example, members' contact lists containing telephone numbers and email addresses (but not physical addresses). as agreed at the EGM on 30 October 2013 [Confirmed 02/03/15)
- 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 official bodies: where we are required to do so by law, or to assist with the investigation and prevention of crime and the protection of national security.
- With the exception of the above, your personal information will never be shared with third parties outside of the club without your explicit permission.

6. **TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY**

The personal information we collect is not transferred to or stored in countries outside of the UK and the European Union. However, data may be stored on "cloud" based systems that are GDPR compliant.

7. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

Generally, where there is no legal requirement we retain all physical and electronic records for a period of *three* years after your last contact with us or the end of your membership, whichever is the longer. Exceptions to this rule are:

- records of your diving, snorkelling, swimming, or associated qualifications.
- information obtained through electronic means such as key fob records;
- images in video and/or photographic form and voice recordings;
- Details regarding unsuccessful membership applicants where we hold records for a period of not more than [24] months;
- any disciplinary and grievance information;
- Information that may be relevant to personal injury or discrimination claims
- email addresses (only) relevant to the club's newsletter subscription, which are held indefinitely, or until unsubscribed.

8. **YOUR RIGHTS AND OBLIGATIONS 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 personal information and to request the correction of inaccurate personal information we hold about you;
- the right to unsubscribe from CyberCrud or the Google groups using the Unsubscribe link.
- the right to request the erasure of your personal information in certain limited circumstances;

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

- 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 (in the future) be able to update some of the personal information we hold about you through our membership portal.

9. **SECURITY OF PERSONAL INFORMATION**

The club takes the following steps to prevent the loss, misuse or alteration of your personal information.

- Only *Officers of the club* (defined as directors, or other club members who have been authorised by the directors) shall have access to personal information held by the club. They must not disclose any such information to any third party without the consent of the directors.
- The club stores personal data on its own systems and also systems belonging to officers.

- Officers are responsible for ensuring that their own systems are suitable for keeping the club's data secure from unauthorised access by the use of strong passwords, biometric data, physical locks or similar.
- If using computers, they must also use anti-virus software and keep their operating systems up to date. Computer data must be regularly backed up to guard against loss or corruption. If storing or backing up data on cloud based systems, these must be GDPR compliant.
- In order to avoid single points of failure, all officers have the right to access all personal data held by the club.

10. **DISCLOSURE AND BARRING SERVICE**

The club may keep records of members who hold DBS certificates. Possession of up-to-date DBS certificates is necessary for instructors to teach children or vulnerable adults.

11. **THE CLUB'S WEBSITE**

SASAC operates its own website at www.sasac.co.uk

If you are unhappy with the website's practices please contact the webmaster, using the contact details below.

The website records the internet protocol address of members' computers for the purpose of analytics. This is done using Google analytics.

The website uses 'cookies', which are files placed on your computer's hard drive. They are placed on your hard drive each time you log in and used to improve the usability of the website. Unless they have been corrupted, all cookies will be deleted when you log out. You can set your computer's browser to automatically block cookies, but this may affect the smooth running of the site.

Where sasac.co.uk contains links to other websites, we are not responsible for the privacy policies of these sites.

12. **THE CLUB'S NEWSLETTER (CYBERCRUD)**

As a member, you will automatically be subscribed to the club's newsletter (CyberCrud). We will continue to hold your email address (only) in the newsletter's mailing list, even if you cease to be a member.

Non-members may also subscribe to the club's newsletter (CyberCrud).by sending a request to cybercrud@sasac.co.uk.

Any person who no longer wishes to receive the club's newsletter can unsubscribe using the link at the bottom of the newsletter.

The newsletter mailing list contains email addresses only. These are not linked to individuals' names, nor do they contain any other personal information. This information is deleted when a person unsubscribes.

Personal data is data that relates to a living individual who can be identified from that data, so subscribers may wish to use an email address that does not contain their name.

13. **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.

14. **CONTACTING US**

In the event of any query or complaint in connection with the information we hold about you, please email membership@sasac.co.uk or write to The Membership Secretary, St Albans Sub-Aqua Club Ltd, Cottonmill Swimming Pool, Cottonmill Lane, St Albans, Herts, AL1 1HJ.

Any questions regarding the website at www.sasac.co.uk should be emailed to the webmaster at webmaster@sasac.co.uk.

Questions about the newsletter (CyberCrud), or requests to subscribe or unsubscribe can be emailed to cybercrud@sasac.co.uk.

If you have any queries about the Privacy Policy itself, please contact the Secretary at companysecretary@sasac.co.uk

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