

## **Rickmansworth Water Ski Club Privacy Policy (May 2018)**

Rickmansworth Water Ski Club, as a private members club, needs to obtain and store personal information about its members in order to carry out its normal business. It will only use this information in accordance with UK law.

Stored personal data will only be accessed by Club officials who need to use it for the normal administration of the Club, which means that members do not have access to other members' personal data unless authorised for a specific purpose by a Club Officer.

The law allows the use of personal information without specific consent if the Club has a genuine and legitimate reason to do so AND we are not harming your rights and interests.

The Club will only collect and use personal data which we believe is necessary for purposes coming under the heading of "legitimate interest". We do not use data for marketing purposes or share it with any third parties except, in the case of members, registration for membership of the sport's governing body, British Water Ski & Wakeboard (see also the later paragraph on 3<sup>rd</sup> Parties).

For members, personal data may be used for, but is not restricted to:

- Distribution of skiing account statements
- Notification of Club dates (such as AGMs, work parties and fun days)
- Notification of changes to Club opening hours
- Registration with the sport's governing body, British Water Ski & Wakeboard

For non members, personal data will only be used for:

- Communication directly related to a booking or purchase of services
- Storing details of disclaimers relating to participation in water skiing or any other club activities

### **The data we collect**

RWSC only collects the minimum data necessary for purposes of "legitimate interest". For members, this includes their name, address, date of birth and telephone number, and if given, an email address. For non members, this would be name and address together with an additional method of contact such as telephone and/or email address.

Except when booking "Beginners Days", data is initially collected on a paper form in order that we also have a signature indicating agreement to abide by the Rules of the Club. Subsequently, members' data may be transferred to an electronic database stored on a secure online server. For Beginners Days, refer to the later section, "Data Controller".

Original forms are stored securely either at the clubhouse or, more usually, at the home of the Club's Treasurer or Secretary. Only two or three of the Club's members (who are usually also members of the Committee) have access to the online database and then only for the purposes of Club administration and/or technical maintenance of the server.

For members, data is retained for the duration of membership plus 3 years. In the case of non members, data is retained for 3 years or if the data is part of a disclaimer, then it may be retained for as long as is reasonably required under UK law to defend an injury claim.

Members and non members may request to see the data we hold on them by contacting the Club Secretary. If any errors are noticed, then the Club will ensure they are corrected as soon as is reasonably practicable. It is a member's responsibility to advise the Club of any required changes to the data we hold.

### **Methods of communication**

RWSC does its best to minimise the use of paper and normal mail, not just for reasons of cost, but also to minimise its impact on the environment.

This means that the preferred method of communication is via email and very occasionally SMS. The law requires that to use electronic communication, RWSC needs to have your specific consent before we can communicate with you in this way.

If a member withholds consent to the use of email and SMS, then all communication will be via hardcopy in a sealed envelope left at the clubhouse for collection by the member. It will not be mailed to them using a postal service. If this leads to a member falling into arrears on their account, then they may be subject to sanctions under the Club's Rules.

If a member wishes to change their consent to electronic communication, they can do so at any time by contacting the Club Secretary.

### **3<sup>rd</sup> Parties**

Third parties and their web sites are not covered by this Privacy Policy. Third parties include the sport's governing body (British Water Ski & Wakeboard) and any other organisation or web site which may be linked to from the Club's website or Facebook page. RWSC is not responsible for any data you may provide after leaving our website or Facebook page and you should check the third party's own website for details of their privacy policy before imparting any personal information.

### **Data Controller**

For the purposes of booking Beginners Days, RWSC uses a 3<sup>rd</sup> party company, Participant UK, to collect initial contact information. Under the GDPR, RWSC is a "Data Controller" and Participant acts as the "Data Processor". Participant UK's web site is <https://www.participant.co.uk> and their privacy policy can be viewed at <https://www.participant.co.uk/privacy>. As with any 3<sup>rd</sup> party, RWSC is not responsible for personal data held by Participant UK's platform and therefore those wishing to book a place on a Beginners Day should read their privacy policy first.

### **Updates**

This Privacy Policy can change from time to time and therefore members and non members alike should check periodically on the Club's website to ensure that they agree with its contents.