

# GDPR—BARC Privacy Policy

We are Bradford Amateur Rowing Club (“**BARC**”). Our Clubhouse is based at Hirst Weir, Higher Coach Road, Baildon, Shipley, BD17 5SP. We are a company limited by guarantee, registered in England & Wales with company number 09662095 and operating from a registered address at 4 Warren Avenue, Eldwick, Bingley, BD16 3BZ. We are registered with the Charity Commission and operate as a charity under charity number 1164951. We have created this privacy policy in order to demonstrate our commitment to Club members’ and other individuals’ privacy and the protection of personal data.

The terms “**we**”, “**our**” and “**us**” in this policy are references to BARC, and the terms “**you**” and “**your**” are references to BARC members or other individuals about whom we collect personal data. The term “adult” used in this policy refers to an individual over the age of 18.

The definitions of “**controller**”, “**processor**”, “**data subject**”, “**personal data**”, “**processing**” and “**process**” used in this policy have the meanings given to them in Regulation 2016/679 of the European Parliament and of the Council on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the **General Data Protection Regulation**), as subsequently consolidated in the Data Protection Act 2018.

BARC is a data controller of Club members’ and other individuals’ personal data. If you would like to know more information about any aspect of this policy, please speak to the Club Secretary Barbara Edwards. Barbara’s email address is [secretary@bradfordrowing.co.uk](mailto:secretary@bradfordrowing.co.uk)

BARC shares personal data with its trading company, Bradford Amateur Rowing Club (Trading) Limited (a private company limited by shares with company number **09784699** and operating from the same registered address as BARC), for the purpose of carrying out trading activities that benefit BARC. Reciprocally, personal data that is collected by Bradford Amateur Rowing Club (Trading) Limited is shared with BARC. BARC and Bradford Amateur Rowing Club (Trading) Limited are run by the same volunteers.

## **What personal data does BARC collect and process ?**

At the point of joining the Club, if you are an adult member we ask you to complete and submit a form which requests your name, date of birth, home address, contact information (including optional emergency contact information), any medical or physical conditions that might affect you or others around you during physical exercise, any special needs that our coaches should know about, your swimming ability and whether you have ever completed a sculling capsized drill. We ask you to confirm what type of membership you would like (adult, student, fitness or social and voting or non-voting), and also ask you questions of interest to the Club in relation to your umpiring, coaching, first aid and launch driving qualifications. At the point of annual membership renewal, we ask you to complete the same information as that provided at the point of joining but the Club will also ask you if there have been any changes to your medical or physical conditions or special needs that our coaches should know about.

If you are a guest rower (over 18) we ask you to complete and submit a form which requests the same information that we collect for adult members (see above). In addition, the form asks you to state if you have British Rowing Membership.

If you are a junior member (under 18), at the point of joining the Club, the form differs in that a parent or carer needs to give written consent for you to join the Club. We collect the following information about junior members: name, date of birth, home address, home telephone number, parent/carers name, email address of parent/carers, emergency contact information, medical or physical conditions that might affect the junior or others around the junior during physical exercise, special needs that our coaches should know about, the junior's swimming ability and whether he/she has ever completed a sculling capsized drill. At the point of annual membership renewal, we ask a junior member's parent/carers to complete the same information as that provided at the point of joining but the Club will also ask if there have been any changes to the junior's medical or physical conditions or special needs that our coaches should know about.

If you enter events, the Club and any of its members may need to collect from you your British Rowing number and rowing/sculling points.

### **Legal bases of processing**

The main legal basis of our processing of a member's personal data is consent (Article 6(1)(a) of the General Data Protection Regulation). Various tick box consents on the membership form will draw your attention to particular consents required for various explained purposes, including consent to receive regular Club newsletters and emails relating to the Club, events at the Club and the sport of rowing. At the point of joining, you will receive a welcome letter and the Club handbook automatically.

If you are an adult member of the Club, we will ask you to tick a box on the membership form to agree that we can share your name and contact information with all other Club members. If you don't agree to this, your ability to participate in the sport and gain full benefit from your membership of the Club will be severely limited as other members will not be able to contact you about rowing (unless you give consent to individual named members yourself), and the Club Secretary will not be able to pass your contact details on to any other member. The Club keeps contact details of all adult members next to the Club telephone to help with the administration of the Club and for emergency purposes. Your name and contact details will be removed from the details next to the Club telephone (or not added if you are a new adult member), if you do not tick the box on the membership form which allows the Club to share your name and contact information with all other Club members.

The Club Secretary asks adult members if they wish to join the Club's yahoo group email account – this can only be done if an adult member clicks to accept an invitation to the group which is sent by email from the Club Secretary.

In an emergency, the legal basis of our processing of a member's personal data is Article 6(1)(d) of the General Data Protection Regulation (the protection of vital interests) – we may share your contact information and your emergency contact information with any other necessary person to protect your vital interests following a rowing accident or another situation in which you require medical attention or other urgent assistance.

If you wish to withhold information from the Club, you do so at your own risk. For example, failure to advise the Club and coaches about your health or physical condition, or any special needs, or failure to provide the Club with emergency contact information, could put your life at risk in the event of a rowing accident or other incident.

If you are a former adult member, we rely on an exemption in the General Data Protection Regulation, as consolidated in the Data Protection Act 2018 (information kept for archiving purposes in the public interest) to keep some personal data of former adult members for the purpose of maintaining details of the Club's history. We comply with the conditions of this legislative exemption (Article 89 of the General Data Protection Regulation and Section 19 and Schedule 2, paragraph 6 of the Data Protection Act 2018, and any guidance issued under these sections). Where we are relying on this exemption, we keep your name and the dates of your Club membership. We are permitted to keep this slimmed down record without your express consent.

### **How do we use your personal data ?**

We use your personal data to administer your Club membership.

If you are an adult member, and you have agreed that we can share your name and contact information with all other Club members, we will be able to do this. In particular, for adult members, we keep names and contact details next to the Club telephone.

If you have consented to receive Club newsletters and emails relating to the Club, events at the Club and the sport of rowing, we will be able to send you these.

If you enter rowing events, the Club Secretary or another member of the Club may send your British Rowing registration number, date of birth, and rowing/sculling points to British Rowing and/or to contacts at other clubs. The Club will also use this information for the purposes of crew formation.

If a member cannot swim, has a health or physical condition, or special needs that coaches need to know about, for safety reasons, the Club will let the person/people coaching that member know this information.

If you have provided emergency contact information (or you are a parent/carer and have provided emergency contact information for a junior member), we will share this information with any other necessary person to protect your/a junior member's vital interests following a rowing accident or another situation in which you/a junior member requires medical attention or other urgent assistance.

Please be aware that we reserve the right to send you safety alerts and updates by email, whether you have consented to receive these or not, on the basis of Article 6(1)(d) of the General Data Protection Regulation - protection of your vital interests (or the protection of the vital interests of a member under 18 for whom you are responsible).

### **Our contact list for participants of non-British Rowing events**

If you are an entry secretary who arranges for you and/or other participants to row at the Club, for example in our War of the Roses event or another regular event, we will keep your name and contact details and details of the event or events for which you help to arrange entry in an electronic record. At the point of first contacting you we will ask you to consent to us holding your name and contact details, and details of the event or events, for the purpose of keeping in touch with you about the Club and events at the Club.

If you've already been an entry secretary, if you subsequently ask us to remove you from our contact list we will not be able to keep in touch with you or contact you again.

If you've already been an entry secretary, and you help to arrange no further events, every five years we will contact you to ask if you wish to be removed from our contact list. If we do not hear back from you we will remove you from our contact list.

### **Event hire**

Where you are interested in booking the Clubhouse for an event, we ask you to complete a form which collects your name, contact details, number of guests and the type of function (including any bands or other acts that you want to attend). The Clubhouse can accommodate a maximum of 80 guests. A condition of hire is that we receive from you a list of the names and addresses of guests before the event. This condition relates to use of the bar and for licence reasons, the need for

us to apply for a Temporary Event Notice before the event (for Clubhouse hirings by non-members).

The event forms and guest lists are destroyed within 3 months after an event has taken place.

### **How do we keep your personal data secure ?**

A copy of your latest membership form is held in hard copy and your details are also held in electronic form, in documents that have password protection. The computer that holds your details in electronic form is in a member's home. The Club cannot guarantee complete security of the member's home in that a domestic home can be burgled and a home computer stolen, and the data could be accessed following a break in, even though it is password protected.

Electronic data is backed up and held as a second copy.

As members are using different email accounts and systems, members should understand that it is difficult to introduce email encryption into the Club's processes, and therefore that email communication between members is also not completely secure.

The name and contact details of a junior member is held only by the Club Secretary and coaches responsible for coaching that junior member.

### **Retention of personal data**

Whilst you are a member, we only keep the latest copy of your membership form (in hard copy) and all old membership forms are destroyed. Whilst you are a member, we also keep an electronic record of the details held in your membership form. When your membership ends, all information is destroyed or deleted (save for, where you are an adult member, we have a right or you have expressly given consent for us to retain your personal data, on which subject please read below).

At the point when your membership ends, if you are an adult member who has joined the Club's yahoo group email account, the Secretary will unsubscribe you from the Club's yahoo group email account.

At the point that your membership of the Club ends, if you are an adult member who has consented to us keeping the latest copy of your

membership form and electronic record for one or both of these purposes, we will delete any sensitive data relating to you that is contained in your latest form and in your electronic record. Sensitive data includes anything that you've told us in relation to your medical or physical conditions or special needs.

If you are an adult member, in our adult membership form we ask you to select wording to indicate whether we can retain your contact information indefinitely or for five years after your membership has ended. If you select five years, we will contact you again five years after the end of your membership to check whether we can continue to contact you. If we do not hear back from you we will remove you from our contact list.

If, when your adult membership of the Club ends, you have not consented to the Club keeping the latest copy of your membership form or your electronic record, for adult members only we will keep a slimmed down record of your membership record for the purpose of maintaining an archive of the Club's history (on the basis of the exemption for information kept for archiving purposes in the public interest). This record will include only your name and the dates during which you were a member of the Club.

Guest rower forms (for guests over 18) are destroyed within a year of you ceasing to be a guest rower.

If you are/were an event secretary for a non-British Rowing event, and you help to organise no further events, every five years we will contact you to ask if you wish to be removed from our contact list. If we do not hear back from you, we will remove you from our contact list.

Event/club hire forms (and any corresponding guest lists provided as part of a Clubhouse hire) are destroyed within 3 months after an event has taken place.

## **Your rights**

Any individual or member (or his/her parent/carer where a member is under 18) has the right to have a copy of the personal data that we hold about you/a junior member. In addition, any individual or member (or his/her parent/carer) can ask us to rectify or reduce the amount of personal data that we hold about you/a junior member, or can ask us to

delete personal data from our records. Individuals and members can withdraw any consents given to us at any time.

Any individual or member (or his/her parent/carer where a member is under 18) has the right to lodge a complaint with the Information Commissioner's Office (the UK regulator), where he/she feels that we have misused or abused the treatment of his/her/a junior member's personal data.

**Effective 1st October 2018**