

**Boughton Lodge Watersports Club  
Data Protection Policy**

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## 1 INTRODUCTION

This document defines the policy that will be followed by Boughton Lodge Watersports Club Ltd with respect to the protection of members personal data and to comply with the requirements of GDPR.

## 2 APPLICABLE DOCUMENTS

The following list of documents contains documents made applicable for establishing this policy.

- AD1. British Waterski and Wakeboard Privacy Policy
- AD2. UK Data protection Act

## 3 BACKGROUND

The General Data Protection Regulation (GDPR) is a regulation in EU law on data protection and privacy for all individuals within the European Union. The GDPR aims primarily to give control back to citizens and residents over their personal data - the GDPR comes into force on 25th May 2018 and it replaces the current 1995 Data Protection Directive.

GDPR applies to any “data controllers” or “data processors” conducted by BLWSC.

## 4 PRIVACY POLICY

### 4.1 Collection of Personal Data

BLWSC may collect and/or create or otherwise obtain and process the following data about you:

- Information about you that you provide by filling in Membership forms while registering to join the club each year and making purchases on our website [www.boughtonlodge.co.uk](http://www.boughtonlodge.co.uk)

This includes information provided at the time of registering to use our websites, becoming a member of BLWSC, entering, attending and volunteering at workparties events, attending Safety Officer of the day or registering as a day member

We may from time to time use third party utilities to collect your personal data for example Social Media.

- Information from your social media accounts but only where you have given us permission to use it. For example, posts, pictures and video footage you share on sites such as Facebook and Twitter.
- We may also ask you for information when you report a problem, report an accident on site or make a complaint and, if you contact us, we may keep a record of that correspondence.
- Details of when you digitally interact with BWSW via our website and other digital channels and the resources that you access which may include the use of cookies (subject to our Cookie policy).
- Information about emails and other communications we have sent to you and your interaction with them.

### 4.2 Uses made of your information and the basis of processing

BLWSC will use your personal information to:

- Authenticate you when you register;
- Carry out our obligations arising from any contracts entered into between you and BLWSC (i.e register your membership with British Waterski and Wakeboard);
- Provide you with club information, where we are legally entitled to do so;
- Notify you via email or post about club information;
- To gather statistics about memberships and people interested in our sport; or
- To segment your personal data to make sure that you only receive information that is relevant to you. For example, if you do not have a caravan we would not email you unnecessarily about caravan issues or rule changes

BLWSC will not use any of the personal information we collect from you to make automated business decisions.

The legal basis on which we collect and process the personal data described above depends on the personal information concerned and the specific context in which we collect it. However, we will only use or share your personal information where we:

- Have your consent to do so;
- Need the personal data to perform a contract with you, i.e register you as a club member;

- Need to process your personal information for our legitimate interests and only where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms;
- Have a legal obligation to collect personal information from you; or
- Need the personal information protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time, and advise you whether the provision of your personal information is mandatory or not (as well as the possible consequences if you do not provide your personal information).

### 4.3 Information security

BLWSC will take all steps reasonably necessary including policies, procedures and security features to ensure that your data is treated securely and protected from unauthorised and unlawful access and/or use, and in accordance with this notice. Unfortunately, the transmission of information via the internet is not completely secure and, although we will do our best to protect your personal data transmitted to us via the internet, we cannot guarantee the security of your data transmitted to our website from your device. Any transmission is at your own risk.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the website, you are responsible for keeping this password confidential. We ask you not to share such a password with anyone.

Where any payments are being collected on our behalf, we require our payment providers to be compliant with the Payment Card Industry's Data Security standards (PCI-DSS).

### 4.4 Recipients of personal data

We will share information about you with BWSW as part of your registration to our national governing body.

We will share information about you with our club insurance company in the event of an accident taking place at the lake and an accident form being completed.

We undertake this data sharing on the basis of our legitimate interests.

### 4.5 Categories of organisation and purpose

- Database hosting companies - to host our digital platforms (e.g. [www.boughtonlodge.co.uk](http://www.boughtonlodge.co.uk)) and associated customer databases to enable customers to log in and interact with the website
- Social media companies (e.g. Facebook/Twitter) - to verify your identify when you register on our web site using any available 'register with' functions and to provide you with relevant social media posts
- Governing body committees - to assist in event management, disciplinary issues and maintenance of Driving/competition licences

### 4.6 International transfer of personal data

We do not envisage transferring any information about or relating to individuals to anyone who is located outside of the United Kingdom.



## 4.7 Data retention period

We will hold information about you in our data systems only for as long as we need it for the purpose for which we collected it, which is as follows:

- As long as you continue to log into our website or use our services (including engaging with emails, making purchases, registering for events) we will retain and process information about you. In such cases, you will be considered to be an 'active' customer. If you cease to be a club member, BLWSC will deactivate your customer account and anonymise any personal data relating to you.
- Personal data linked to the processing of insurance claims, subject access requests, disputes, safeguarding investigations, disciplinary or police matters will only be kept for as long as it necessary for those purposes, as each is applicable.

## 4.8 IP addresses and cookies

We will not collect information about your computer, including where available your IP address, operating system and browser type.

## 4.9 The data subject's rights

Data protection laws grant you, as a Data Subject, certain 'information rights', which are summarised below:

- Right of access - You have the right to obtain a copy of information we hold about you.
- Right of rectification or erasure - If you feel that any data that we hold about you is inaccurate, you have the right to ask us to correct or rectify it. You also have a right to ask us to erase information about you where you can demonstrate that the data we hold is no longer needed by us, or if you withdraw the consent upon which our processing is based, or if you feel that we are unlawfully processing your data. Please note that we may be entitled to retain your personal data despite your request, for example if we are under a separate legal obligation to retain it. Your right of rectification and erasure extends to anyone we have disclosed your personal information to and we will take all reasonable steps to inform those with whom we have shared their data about your request for erasure.
- Right to restriction of processing - You have a right to request that we refrain from processing your data where you contest its accuracy, or the processing is unlawful and you have opposed its erasure, or where we do not need to hold your data any longer but you need us to in order to establish, exercise or defend any legal claims, or we are in dispute about the legality of our processing your personal data.
- Right to Portability - You have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent and is carried out by automated means. This is called a data portability request.
- Right to Object - You have a right to object to our processing your personal data where the basis of the processing is our legitimate interests including but not limited to direct marketing and profiling.
- Right to Withdraw Consent - You have the right to withdraw your consent for the processing of your personal data where the processing is based on consent.
- Right of Complaint - You also have the right to lodge a complaint about any aspect of how we are handling your data with the UK Information Commissioner's Office, which can be contacted at [www.ico.org.uk](http://www.ico.org.uk).
- Right to Opt-out of Marketing Communications - You have the right to opt-out of marketing communications we send to you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us

using the contact details provided below. Changes to our privacy policy Any changes we may make to our Privacy Notice in the future will be posted on our website and, where appropriate, notified to you by date-stamped communication.

#### **4.10 How to contact us**

If you wish to contact us about your personal data or exercise any of the rights described above please contact:

Boughton Lodge Watersports Club  
Email : [Membership@boughtonlodge.co.uk](mailto:Membership@boughtonlodge.co.uk)

## 5 DATA PROTECTION

Boughton Lodge WaterSports Club (BLWSC) is fully committed to compliance with the requirements of The General Data Protection Regulation (GDPR) (EU) 2016/679.

BLWSC needs to collect and use certain types of information about its members. This personal information must be dealt with appropriately however it is collected, recorded and used; this principle applies whether on paper, on a computer or recorded by other means.

BLWSC regards the lawful and correct handling of personal information as essential and therefore ensures that personal information is treated with sensitivity at all times. To this end the BLWSC fully adheres to the GDPR as detailed in the Regulation.

BLWSC is legally bound to abide by the data protection principles embodied in current legislation.

### **These specify that personal data must be:**

- Processed fairly and lawfully;
- Obtained for specified and lawful purposes;
- Be adequate, relevant and not excessive;
- Be accurate and kept up-to-date;
- Not be kept any longer than necessary;
- Be processed in accordance with the data subject's (the individual's) rights;
- Be kept secure
- Not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.

### **BLWSC will through appropriate management, strict application of criteria and controls:**

- Fully observe the conditions regarding the fair collection and use of the information;
- Meet its legal obligations to specify the purpose for which the information is used;
- Collect and process only that information which is required in order to fulfil operational needs or the compliance of legal requirements;
- Ensure the quality of all information used;
- Apply strict checks to determine the length of time information is held;
- Ensure the rights of people about whom information is held can be fully exercised under current legislation, that includes the right to be informed that processing is being undertaken, the right of access to one's personal information, the right to prevent processing in certain circumstances and the right to correct, rectify, block or erase information which is regarded as incorrect information;
- Ensure that appropriate technical and organisational security measures are in place to safeguard such personal information;
- Ensure that no transfer of information is made abroad without suitable safeguards being in place;
- Treat people impartially and fairly irrespective of their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information;
- Have in place clear procedures for responding to requests for information.

### **In addition to the above, BLWSC will ensure that:**

- There is a Committee Officer with specific responsibility for Data Protection;
- All Committee members responsible for managing and handling personal information understands that they are responsible to follow good data protection practices;
- Methods of dealing with personal information are clearly described;

- Monitor and review the way personal information is held, managed and used;
- The methods of handling personal information are regularly assessed and evaluated; •
- All committee members are aware that any breach of the rules and procedures relating to Data Protection must be reported and addressed appropriately

## 6 DEALING WITH A BREACH OF DATA PROTECTION

In the event of detecting a breach or being notified about a breach of data protection the following procedure shall be followed :

1. Notify the clubs data protection officer of the actual or suspected breach
2. Implement immediate protection to protect remaining data
3. Identify to what extent club members data has been released
4. Notify the member(s) concerned of the extent of the breach
5. Determine with the clubs data protection officer the extent of the data breach, to determine if this is required to be reported to the ICO within 72 hrs of the breach
6. Report the data breach and extent of the breach and the next available committee meeting include all actions undertaken. The minutes of the committee meeting will remain the record of the breach
7. Review process and Policy to ensure that the breach does not happen again

## 7 MEMBERSHIP FORMS ADDITIONAL INFORMATION

The following text is to be added to the membership forms both new and renewals

BLWSC are committed to protecting and respecting your privacy. For any personal data you provide for the purposes of your membership, BLWSC is the Data Controller and is responsible for storing and otherwise processing that data in a fair, lawful, secure and transparent way.

### **What personal data we hold on you**

You may give us information about yourself by filling in forms at an event or online, or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register with the Club. The information you provide to us may include your name, date of birth, gender, email address, postal address, telephone number(s), names of any other affiliated clubs that you are a member of and details of any coaching, boat driving, competition data or officiating qualifications you hold. We may also ask for other data as appropriate.

### **Why we need your personal data**

The reason we need your data as detailed above is to be able to administer your membership and provide the membership services you are signing up to when you register with the club. Our lawful basis for processing your personal data is that we have a contractual obligation to you as a member to provide the services you are registering for.

Reasons we need to process your data include:

- ***Membership and club / centre management***
  - Processing of membership applications / renewals and payments.
  - Share data with committee members to provide information about club activities, membership renewals or invitation to social events or ability to assist with coaching and officiating at competitions.
  - Publishing of any competition results.
  - Website / online portal management.
  - In order to complete any accreditation process where for example the qualifications and roles of committee members require the identification of those individuals via the sharing of data with the governing body.
- ***National Governing Body Member Registration***
  - Registering your personal details with British Water Ski & Wakeboard for the provision of membership services e.g. personal accident insurance, membership card issue and mailing of magazines and access to discounts and other member benefits.
  - For the registration / issue of qualifications, event entry, competition licences and the publishing of any competition results in any leagues and ladders.
- ***Training and Competition Entry***
  - Share data with club coaches or officials to administer training sessions.
  - Share data with club team managers to enter events.
  - Share data with facility providers to manage access to the facility.
  - Share data with leagues, other associations and other competition providers for entry in events.

- **Marketing and communications (where separate consent is provided)**
  - Sending information about promotions, offers and member benefits.
  - Sending club newsletters.
  - Sending information about selling club kit, merchandise or fundraising activities.

The club has the following social media pages Facebook, Twitter, Instagram. All members are free to join these pages. If you join one of the Social Media pages, please note that provider of the social media platform(s) have their own privacy policies and that the club do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data on the club social media pages. We operate CCTV on our premises. These images are recorded purely for the purpose of crime prevention and public safety.

## Who we share your personal data with

When you become a member of the Club, you will also automatically be registered as a member of British Water Ski Federation Limited (trading as British Water Ski & Wakeboard). We will provide any appropriate data as detailed above which they will use to enable access to the MyBWSW portal and provide membership services. British Water Ski & Wakeboard will contact you to invite you to sign into and update your MyBWSW portal. You can set and amend your privacy settings from the MyBWSW portal. If you have any questions about the continuing privacy of your personal data when it is shared with British Water Ski & Wakeboard, please contact [info@bwsf.co.uk](mailto:info@bwsf.co.uk).

## How long we hold your personal data

We will hold your personal data on file for as long as you are a member with us. Your data is updated every year on annual membership forms. Any personal data we hold on you will be securely destroyed after four years of inactivity on that member's account, in line with British Water Ski & Wakeboard's retention policy. Your data is not processed for any further purposes other than those detailed in this policy.

## Your rights regarding your personal data

As a data subject you may have the right at any time to request access to, rectification or erasure of your personal data; to restrict or object to certain kinds of processing of your personal data, including direct marketing; to the portability of your personal data and to complain to the UK's data protection supervisory authority, the Information Commissioner's Office about the processing of your personal data.

All such requests should be made in writing to [membership@boughtonlodge.co.uk](mailto:membership@boughtonlodge.co.uk).

As a data subject you are not obliged to share your personal data with the Club. If you choose not to share your personal data with us we may not be able to register or administer your membership

## DOCUMENT CHANGE DETAILS

ISSUE	RELEVANT INFORMATION/INSTRUCTIONS
1	Initial Issue