



## **Warminster Adventure Sports Club**

### **Privacy Policy**

**V1.0 November 2020**

#### **1. Introduction**

The Warminster Adventure Sports Club (“the WASC”, “we”, “us”) will collect and use relevant personal information in a safe, secure manner.

This Policy describes our commitments to you, in compliance with regulations (such as the General Data Protection Regulation and the UK Data Protection Act 2018), and explains how we collect, store and use your personal information.

The Committee of the WASC oversee our compliance with data protection laws. If you have any questions about this Policy or what the WASC does with your personal information, contact details are set out in the “Contact” section below.

#### **2. What data we collect about you**

We need to collect specific, relevant personal information from you in the following circumstances:

##### **2.1. Membership**

When you apply for club membership, we need to obtain personal information from you that enables us to administer your club membership, including your membership of organisations with which the WASC is affiliated. This may include:

- Personal contact details that allow us to contact you directly, such as your name, address, email addresses, telephone numbers, social media account details
- Date of birth
- Family members connected with your membership
- Next of kin details
- Payment information – bank account number, sort code, card details, records of amounts paid

- Records of your attendance at events organised and/or hosted by the WASC, including records of any incidents or near misses
- Your communications and marketing preferences so that we know whether and how we should contact you and/or include you in group communications

## **2.2. Trial Membership**

When you indicate to us that you are interested in a Trial Membership and/or when you attend an event organised and/or hosted by the WASC whilst not a full member, we may collect personal information from you in order to administer your Trial Membership or to fulfil legal or contractual obligations, such as Contact Tracing.

This may include:

- Personal contact details that allow us to contact you directly, such as your name, address, email addresses, telephone numbers, social media account details
- Date of birth
- Family members connected with your Trial Membership or attendance
- Next of kin details
- Payment information – bank account number, sort code, card details, records of amounts paid
- Records of your attendance at events organised and/or hosted by the WASC, including records of any incidents or near misses
- Your communications and marketing preferences so that we know whether and how we should contact you and/or include you in group communications

## **2.3. Events**

When you attend events organised and/or hosted by the WASC, in addition to any Membership or Trial Membership details, we may collect the following information:

- Technical proficiency in relation to adventure activities being undertaken
- Details of any formal qualifications relating to the adventure activities being undertaken
- Dietary requirements
- Accommodation requirements and/or details
- Medical/health information that you indicate to us may be relevant to the activities you may undertake with the WASC

## 2.4. Volunteering, including for membership of the Committee

When you volunteer to assist with activities of the WASC, in addition to any Membership, Trial Membership or Events details, we may collect the following information:

- Details of any training and/or experience relevant to the role for which you are volunteering

## 3. How we use your data

The table below describes the main purposes for which we process your personal information, the categories of your information involved and our lawful basis for being able to do so.

Purpose	Personal Information Used	Lawful Basis
To administer your Membership or Trial Membership of the WASC	All contact and membership details, transaction and payment information, records of your interactions with us, and communication and marketing preferences.	This is necessary for us to properly manage and administer your Membership or Trial Membership contract with us.
To administer your membership of relevant sporting bodies with which the WASC is affiliated (e.g. the British Mountaineering Council, British Canoeing).	Contact and membership details.	We have a legitimate interest in providing the benefits of affiliate membership to our members, including but not limited to insurance cover for the adventure activities of the WASC.
To answer any queries or complaints	Contact details and records of your interactions with the WASC.	We have a legitimate interest in providing a queries and complaints handling process in line with the WASC Constitution.
To provide for the safe and smooth running of events organised and/or hosted by the WASC, and to administer your attendance at such events	Contact and membership details, transaction and payment information, specific medical and/or health information	We have a legal obligation to comply with Health & Safety requirements. We and our members have a legitimate interest in being able to provide and attend events which run smoothly and where risks, particularly to physical health, are appropriately managed.  Where necessary we may process your specific medical and/or health information where it is in your vital interests to do so. We will seek your explicit consent to process such information unless it is clear that you are physically or legally incapable of giving informed consent.

To send you or provide you with access to information on Membership, events and participation in WASC related activities	Contact and membership detail, and your communication and marketing preferences	Where you have provided your explicit consent to do so.
To promote the benefits of WASC Membership to the general public	Images in video and/or photographic form.	Where you have provided your explicit consent to do so.

#### 4. How we collect your data

We typically collect information that you provide by:

- Filling in forms that we may provide, particularly Membership forms
- Contacting you in accordance with your communication preferences to ask specific questions in relation to your Membership, Trial Membership, or participation in Events

If you contact us, we may keep a record of that correspondence.

#### 5. Disclosure of your personal data

Where applicable, we may share your personal information:

- 5.1. To relevant sporting bodies with which the WASC is affiliated (e.g. the British Mountaineering Council and British Canoeing), in order for them to properly administer your affiliate membership of those organisations.
- 5.2. The UK Government or other regulators where we are required to do so by law.
- 5.3. The Police, law enforcement and security service where we are required to assist with the investigation and prevention of crime and protection of national security.
- 5.4. With WASC Event Organisers, who will be members of the WASC responsible for the organisation of WASC Events which you have indicated you will attend or which you do attend, where required for the safe and smooth running of those Events.
- 5.5. To external service providers: for example providers of IT services used for membership, event and club administration.
- 5.6. To emergency healthcare professionals working in public emergency services, where it is in your vital interests to do so.

We do not disclose personal information other than as set out above and will never sell your personal information.

## 6. Where we store your data

The WASC will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Where possible data will remain on servers within the European Economic Area (EEA), however, we may store data on servers outside of the EEA when there is no other suitable alternative. When we store data in non-EEA countries we ensure there are adequate safeguards including a 3rd party data agreement with sufficient data protection clauses.

## 7. How long we store your data

In general, personal information that is collected and processed by the WASC for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

Without prejudice to the above, the WASC will normally apply the following retention periods for the categories set out below, after which personal information will be deleted.

<b>Record Type</b>	<b>Retention Period</b>
Information provided on a Membership Form	For the duration of the Membership plus 6 years
Records relating to administration of your Membership (including payments, all contact, communication and marketing preference information, and records of interactions with the WASC)	For the duration of the Membership plus 6 years
Information provided on a Membership Form, where only a Trial Membership was taken up	6 years after last interaction
Information provided on a Membership Form where no further interaction occurred within 1 calendar year	2 years
Records relating to specific WASC Events	2 years
Social Media and Website content	Indefinitely

Notwithstanding the other provisions of this section, the WASC will retain documents (including electronic documents) containing personal data:

- to the extent that the WASC is required to do so by law;
- if the WASC believes that the documents may be relevant to any ongoing or prospective legal proceedings;
- and in order to establish, exercise or defend the WASC's legal rights.

## 8. Children

When we process children's personal information, where required we will not do so without their consent or, where required, the consent of a parent/ guardian. We will always have in place appropriate safeguards to ensure that children's personal information is handled with due care.

## 9. Communication and Marketing

The WASC administers a number of member communication channels to which you may subscribe. When you do so, your contact information will be shared with other WASC members. You are under no obligation to subscribe, and you may manage your subscription to such communication channels by making requests to the Committee members at any time by email to **committee@thewasc.org**

The WASC may contact you, according to your expressed preferences for marketing, by email, post, SMS or other online messaging platform in order to inform you about Events we believe you may be interested in. You may amend your preferences at any time by making a request to the Committee members by email to **committee@thewasc.org**

When you become an Affiliate Member of a relevant sporting body with which the WASC is affiliated, that organisation may contact you in order to provide further mechanisms by which you may manage your preferences in relation to communication and marketing for that specific sporting body.

## 10. Your Rights

You are entitled by law to ask for a copy of your personal information at any time. You are also entitled to ask us to correct, delete or update your personal information, to send your personal information to you or another organisation and to object to automated decision making. Where you have given us your consent to use your personal information in a particular manner, you also have the right to withdraw this consent at any time.

To exercise any of your rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contact" section below.

You should note that some of your rights may not apply as they have specific requirements and exemptions which apply to them and they may not also apply to personal information recorded and stored by us. However your right to withdraw consent or object to processing for direct marketing are absolute rights.

If you are unhappy with the way we are using your personal information you can complain to the UK Information Commissioner's Office or your local data protection regulator. More information about your legal rights can be found on the Information Commissioner's website at <https://ico.org.uk/for-the-public/>. However, we are here to

help and would encourage you to contact us to resolve your complaint first.

## 11. Contact

You can contact the WASC Committee using one of the following methods:

By Email:	<a href="mailto:committee@thewasc.org">committee@thewasc.org</a>
By Post:	Warminster Adventure Sports Club 103 Westbury Leigh Westbury BA13 3SU