

# **Springwood Sun Club**



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Website: [springwoodsunclub.co.uk](http://springwoodsunclub.co.uk)

19<sup>th</sup> July 2019

## **Privacy Notice - how we use your data**

### **Introduction**

At Springwood Sun Club we take your privacy seriously and are committed to ensuring that your personal data is protected in accordance with General Data Protection Regulation and used in line with your expectations.

This privacy notice explains what personal data we collect, why we collect it, how we use it, the control you have over your personal data and the procedures we have in place to protect it.

### **What personal data we collect**

We collect and hold personal data about you in order to process membership forms, make payments to you when necessary and to share data with the relevant committee members to enable them to carry out their roles efficiently.

The information we hold will include:

- Application forms containing contact details, i.e. address, phone/mobile numbers, email address, date of birth and emergency contact details.
- Accident book.
- Signing in book.
- Chalet contact details in the event of the chalet owners death.
- Copies of training/qualification certificates, i.e. First Aid, Archery.
- Safeguarding records (October 2018)
- CCTV – 14 day continual and overlapping recording. (January 2019)
- Copies of visitors' identification – Photographic and address. (March 2019)

Where applicable bank details may also be held.

## **Why we collect personal data and the legal basis for handling your data**

We use this personal data for the administration of Springwood Sun Club to safeguard all of its members and to fulfil the contractual arrangement in the case of visitors, which they have entered into.

We use this personal data to:

- To contact you in case of an emergency.
- To contact you with regard to your enquiry, booking or application for membership.
- To keep you updated with information about the club, i.e. newsletters, social and sports updates.
- To have up to date contact details.
- To have up to date qualification details.
- To reimburse you financially.
- To have up to date contact details in the event of the chalet owners death.
- To contact the Local Authority Designated Officer (LADO) or a local police force. (October 2018)
- Visitors - To assist you or contact your next of kin in the event of an emergency. (March 2019)

## **Consent**

Springwood Sun Club gives all individuals real choice and control. All application forms have an opt-in tick box system to ensure consent is explicit. Within this privacy notice we alert all club members to the fact they can withdraw consent at any time.

The forms are written in plain language clear, concise and easy to understand.

The consent forms are monitored and reviewed on a regular basis to ensure compliance with the General Data Protection Regulations.

You will have the opportunity to withdraw your consent at any time, for information given, by confirming so in writing.

## **Cookie Data Collection**

[Google Analytics \(July 2019\)](#) are an online service which helps us to understand our visitors, i.e. how visitors find our website, how long they spend on our site, which web pages they are most interested in etc. We use [Google Analytics \(July 2019\)](#) because better understanding of how visitors are interacting with our website helps us to improve the content, design and functionality of our website. This allows us to offer a better online experience to our visitors.

[Google Analytics \(July 2019\)](#) uses cookies and other technologies to collect data on visitors and visitor activity on our website.

This data includes:

- Time and date of visit (this can help us to identify and plan for busy periods on our website).
- IP address (this is a numerical label assigned to a device by an Internet Service Provider to enable the device to access the internet).
- Browser and Operating System (this can help us to make sure that our website functions correctly in the browsers/operating systems used to access our site).
- Device Information, i.e. device type and screen size, [desktop, tablet or mobile \(July 2019\)](#) (this can help us to make sure that our website functions correctly on the devices used to access our site)
- Referring Data, i.e. a search engine link (this can help us to understand which search engines are helping visitors to find our website)

Furthermore, when you visit our website a first party cookie may be placed in your browser. This cookie is used only to determine whether you are a first-time or returning visitor and to estimate unique visits to the site.

[\(July 2019\) There are also cookies used by our website provider go daddy.](#)

[Support Cookies are used to track user activity and failed actions, so we could have more data when we start troubleshoot your issues. Interactive services such as chat support and customer feedback tools can't work without these cookies.](#)

[Below are links for further reading in relation to the cookies we use, and information from our website provider go daddy, and our contact/camping form, as well as analytics provider google.](#)

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage>

<https://support.google.com/analytics/answer/6004245?hl=en>

<https://uk.godaddy.com/trust-center>

<https://uk.godaddy.com/legal/agreements/cookie-policy>

### **Who we share the data with**

Springwood Sun Clubs Committee share data with each other in order for Committee members to carry out their roles and responsibilities to the club.

In order for the Committee to fulfil their roles they share data with each other as follows:

- To communicate with the members.
- To collect yearly membership subscriptions.
- Applications for membership.
- Bookings for camping.
- To enable photographs to be taken.
- To enable grievances to be dealt with.

We will also share your data if:

- we are legally required to do so, for example, by law or by a court.

We will never share your data with any other organisation to use for their own purposes.

We will not give information about you to anyone without your consent unless the law and our policies allow us to do so. If you want to receive a copy of the information about you that we hold, please contact

The Secretary – Springwoodcolchester@hotmail.com

### **How we store your data and protect your data**

All data you provide us with is stored on a secure laptop, encrypted password memory sticks or kept in a secure, locked cabinet which is accessed by the Chairperson, Secretary and Treasurer. The electronic format is stored on a secure cloud server with access to the total data only available to the 3 officers previously mentioned with the various other officers of the club only having access to their respective folders (Membership Secretary, Minutes Secretary, Social Secretary, Sports Organiser, Site Wardens). If the club should be without any of the aforementioned Committee Members, then a competent club member(s) shall be appointed by the Committee to carry out the role until the following AGM. (August 2018)

- Personal data, i.e. contact details including date of birth and email addresses are stored on an Excel type file which is password protected.
- Photographs (and CCTV pictures, when required (January 2019)) are stored in a secure, locked cabinet on an encrypted, password protected flashdrive. The Chairperson, Secretary, Treasurer and Club Photographer shall have access to the photographs. Photographs will be deleted from the Club photographer's camera immediately after they have been transferred to the flashdrive.
- [Only website and social media use \(July 2019\)](#) photographs will be stored on a cloud-based hosting environment [provided by Go daddy and Facebook. \(July 2019\)](#)
- Safeguarding records are stored in a locked filing box which is accessed by the Trustees. (October 2018)
- Visitors identification is stored in a secure, locked cabinet and accessed by the Chairperson, Secretary, Treasurer and Membership Secretary. (March 2019)

Club members are made aware from the outset what data will be processed and how it will be used in the administrative work of Springwood Sun Club.

### **Data breach notification**

We would recognise a data breach through an anti-virus prompt alerting us to an attempted breach of our data. The responsibility lies with Springwood Sun Club/Chairperson to deal with such a breach and assess the situation. It would be their responsibility to contact the individuals affected by the breach and escalate this to the Information Commissioner's Office (ICO) if necessary, within 72 hours. All breaches would be fully documented.

### **How long do we retain your data?**

We retain your personal data for 3 years after your membership ceases.

Accident books are kept for 3 years from the date that the last recorded entry is created; or 3 years after the injured parties 18<sup>th</sup> birthday.

Disciplinary Procedures are kept for 2 years from the date of the last recorded communication unless the Disciplinary action is ongoing.

Safeguarding records are kept until the recorded party has reached the age of 25 years.  
(October 2018)

Visitors personal data is kept for the duration of the summer season and then destroyed.  
(March 2019)

“A personal data breach can be broadly defined as a security incident that has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals.”

### **Access requests**

If a Club member makes a request for information (pertaining to themselves or their child) no charge will be made. The Secretary will comply within a month.

### **Individual rights**

All Club members have:

- the right to be informed
- the right of access
- the right to rectification
- the right to erasure
- the right to restrict processing
- the right to data portability
- the right to object
- the right not to be subject to automated decision-making including profiling.

If you wish to exercise any of these rights at any time or if you have any questions, comments or concerns about this privacy notice, or how we handle your data please contact us.

### **Complaints**

Springwood Sun Club will inform Club members of our Privacy Notice.

If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the Information Commissioner’s Office (ICO). The ICO can be contacted at Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or [ico.org.uk](http://ico.org.uk)

### **Changes to this notice**

The Springwood Sun Club Committee will keep this privacy notice under regular review and any changes will be posted on the website at [www.springwoodsunclub.co.uk](http://www.springwoodsunclub.co.uk).

Where appropriate all Club members will be notified either by email or post, ensuring you are aware of how we use your data, at all times.