



Data Protection and Privacy Policy



Data Protection and Privacy Policy

This document outlines how Calshot and Waterside Alliance of Clubs (CWACS) processes and manages personal data and:

- Identifies the data controller.
- Explains the lawful basis for processing personal data.
- Outlines the personal data held and processed.
- Outlines the scope of the special category personal data held and processed.
- Outlines the process of Subject Access Requests.

1. Data Controller

The Data Controller is CWACS.

2. Contact

If you have any questions about this policy or for more information about how we use your data or would like to exercise any of your rights contact CWACS.

3. Lawful basis for processing

All processing is carried out by consent of Affiliated Clubs and members for facilitating the collection of membership fees and covers processing and managing communications. Also including fundraising through the CWACS website to support Affiliated Clubs, Associate Clubs, CWACS Bursary Scheme or a Calshot Activities Centre Project.

4. Data sources

- Data held is that provided by Affiliated Club members when they sign up to their club on the CWACS website or if they contact us by any other means. We may also hold data that members provide when we contact them for any other purpose. Members not wishing us to contact them by telephone should not provide this information.
- Data held includes that provided by individual Officers of CWACS, representatives of Volunteer Organisations, representatives of Associate Clubs and Honorary Members.
- Data held is that provided by supporters donating via the CWACS website.

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5. Data Security

Personal data is stored electronically and securely.

6. Special category data

Special category data will be processed under the lawful basis of the Data Protection Act. This covers personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data and biometric data processed for the purpose of uniquely identifying a natural person.

7. Transferring your data outside of the European Economic Area

The EU GDPR adequacy decision means that data can continue to flow between the UK and the European Economic Area (EEA). Some service providers are located outside of the EEA and therefore it may be necessary to transfer your personal data outside of the EEA. Where the transfer of your data outside of the EEA takes place, we will make sure that it is protected in the same way as if the data was inside the EEA, and it only occurs with your consent.

We will use one of the following safeguards to ensure this:

- Where the European Commission has issued an adequacy decision determining that a non-EEA country or organisation ensures an adequate level of data protection.
- A contract is put in place with the recipient of the data obliging them to protect the data to the same standards as the EEA.

Legally it is not permitted to transfer certain types of data, such as Electoral Register Data, outside of the EEA, and we honour that obligation.

8. Data retention policy

Personal data will be held for no longer than necessary. Some types of data may be held for longer than others. Review of the data held will occur to determine whether it should be maintained or put beyond use. All financial information is encrypted and destroyed when it is no longer needed.

9. Subject Access Requests

We will request verification of the identity of any individual making a request, ask for further clarification and details if needed and respond within one calendar month once we have confirmed it is a legitimate request. In accordance with ICO guidelines, we keep a log of Subject Access Requests that contains details of the request, including that which can identify you personally, indefinitely.

Data subjects have the right to the following:

- To be told whether any personal data is being processed.
- To be given a description of the personal data, the reasons it is being processed and whether it will be given to another organisation or people.
- To be given a copy of the information comprising the data and given details of the source of the data where this is available.

10. Will we share your data with anyone else?

If you have contacted us about a personal or membership issue, your data may be passed on to a third-party while dealing with your enquiry, such as the local authority. Any third parties that we may share your data with are obliged to keep your details securely and to use them only for the basis upon which they were originally intended.

We may need to share your data with a third party, such as the police, if required to do so by law. In the event of a police investigation. Your name and contact details submitted via the sign-up form are only retained on the website if you grant consent to join the email subscriptions list. Anonymised data from the Contact form is retained for benchmarking purposes.

Your personal data is only used as outlined here and within your reasonable expectations based on the nature of the communication.

11. Data Rights

At any point you have the following rights:

- Right of access – you have the right to request a copy of the information held about you.
- Right of rectification – you have a right to correct data held about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data held about you to be erased from our records.
- Right to object – you have the right to object to certain types of processing, such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: if our office refuses your request under rights of access, we will provide you with a reason why. You have the right to complain.

12. Making a complaint

If you are unhappy with the way that we have processed or handled your data, then you have a right to complain to the Information Commissioner's Office (ICO). The ICO is the supervisory body authorised by the Data Protection Act 2018 to regulate the handling of personal data within the United Kingdom. The contact details for the ICO are:

- Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF
- Telephone: 0303 123 1113
- Website: <https://ico.org.uk/concerns/>

If you have any questions about the data held, please contact CWACS or your Club secretary.

Please note that proof of identity is required should you choose to exercise any of the above rights in relation to personal data.

We retain the right to update this policy at any time. If there are changes that significantly impact your rights, we will contact you in advance.

13. Affiliated Clubs, Associate Clubs and Volunteer Clubs

Each of the above clubs will have its own Data Protection and Privacy Policy.