



Version: 2.2, Final  
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Date Approved: May 2018  
Next Review: May 2019

# Privacy Notice

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## What is a privacy notice?

A 'privacy notice' is a statement issued by an organisation which explains how personal and confidential information about individuals is collected, used and shared. This may also be called a privacy statement, fair processing statement or privacy policy. This privacy notice is issued by Poole Harbour Canoe Club ("PHCC") in relation to the information we collect about our members, and other relevant individuals, as part of our activities.

## Who are we, and what do we do?

PHCC is a local members' club based in Dorset, which is regulated by British Canoeing (formally the "British Canoe Union"). PHCC is registered as a Charitable Incorporated Organisation (Registration No. 1152531), which means that we are a not-for-profit organisation which is run by volunteers. PHCC is dedicated to promoting canoeing for fun, fitness and friendship to club members and the wider community. We also offer advice, support and expertise on a number of other related interests, and help to coordinate group activities, events and training.

## Why have we issued this privacy notice?

By issuing this privacy notice, we are demonstrating our commitment to openness and accountability. We recognise the importance of protecting personal and confidential information in all that we do, and take care to meet our legal and regulatory obligations, including those under the Data Protection Act 1998/2018, the General Data Protection Regulation (GDPR), and the Human Rights Act 1998.

## How do we collect your information?

The primary way we collect information about our members is through a web-based database called "WebCollect", which is owned by Open Brackets Limited. WebCollect provides a "membership management solution" to clubs such as PHCC, and further information about the company can be found here: [https://webcollect.org.uk/pub/about\\_us](https://webcollect.org.uk/pub/about_us).

Any individual can register as a member of PHCC by creating an account directly with WebCollect, the link for which is available on our website: [www.pooleharbourcanoecub.uk/join.html](http://www.pooleharbourcanoecub.uk/join.html). Members under the age of 18 are registered under the account of someone with parental responsibility, and therefore information concerning the child/young person is provided with appropriate parental consent.

For certain members, it may be necessary for us to collect additional information – for example, details concerning checks and clearance from the Disclosure and Barring Service ("DBS") about our coaches and trainers. This information may be collected directly from individuals, as well as third parties such as the DBS and British Canoeing.

Closed Circuit Television ("CCTV") is in operation at the PHCC Clubhouse at Lake Pier, Lake Drive, Hamworthy, BH15 4LR. This is used for the prevention and detection of criminal activity and by its nature may involve the digital recording of both members and the general public. This information is collected and retained in accordance with the ICO Code of Practice: <https://ico.org.uk/for-the-public/cctv/>.

As part of PHCC activities, events and training, we may take photographs which could include club members and/or general members of the public. Official photographs taken on behalf of PHCC are taken by a specifically appointed member. Photographs taken by other club members or general members of the public for personal/domestic purposes do not fall within the responsibility of PHCC and are therefore not included within the scope of this privacy notice.

## What information do we collect and why?

We will only process your personal data where we have your consent or where it is legally justified under UK law. This may include circumstances where the processing is necessary as part of the legitimate interests of PHCC, or for compliance with any legal obligations which apply to us.

At the time of registration (for new members) and subscription renewal (for existing members) via WebCollect, we will explain why we are collecting your information and how it will be used. We will also indicate what information is a mandatory requirement, and why. As standard, we will collect the following information about all our members: full name(s), email address, house name/number, postcode, year of birth, and gender (from list). We do not collect or store any financial/payment information about our members. All subscription payments are managed directly with WebCollect and covered under their privacy notice: <https://webcollect.org.uk/help-topic/privacy-notice>.

As part of our statutory duties, we are required to ensure that all coaches and trainers have the appropriate DBS clearance level. As part of this process, which is facilitated via British Canoeing, GBG Online Disclosures will collect additional information about these members to enable the DBS application – please refer to their privacy notice for details: [www.onlinedisclosures.co.uk/legal/privacy-policy/](http://www.onlinedisclosures.co.uk/legal/privacy-policy/). PHCC will only retain limited DBS details in order to ensure that renewals are monitored and completed. This information is restricted to: full name(s), email address, date of check, E No. and date of next renewal.

We will endeavour to make individuals aware if/when official photographs are being taken of PHCC activities, events and training, and how the photographs might be used (i.e. uploaded online, used in newsletters, etc). Although these photographs are taken for genuine and reasonable purposes as part of the legitimate interests of PHCC (i.e. to promote the activities of the club and encourage new and continued membership), individuals will be made aware of their right to decline being part of the photograph/having their photograph taken, and also of their right to have a photograph deleted at any time in the future. Parental permission will be obtained for photographs of children under 18 years.

## How do we keep your information safe and maintain confidentiality?

Under data protection legislation, strict principles govern our use of information and our duty to ensure it is kept safe and secure. Your information will be primarily held within electronic records, with access restricted to only those individuals with a legitimate professional reason. This access will be controlled through the use of technology and other appropriate environmental safeguards.

In certain circumstances, we may also be bound by the Common Law Duty of Confidentiality, which means that any information you provide to us in confidence will only be used in connection with the purpose(s) for which it was provided, unless we have specific consent from you or there are other special circumstances covered by law. For example, we may have a legal or statutory obligation to share information about a safeguarding concern without seeking prior consent from you.

All of our volunteers are required to protect information, inform you of how your information will be used, and allow you to decide if and how your information can be shared. We endeavour to explain our responsibilities and your rights as part of the registration and subscription-renewal processes.

## How do we use your information, and who is it shared with?

The primary purpose of collecting your information is to enable us to keep in contact with you regarding your membership and the activities of PHCC. Only a small number of PHCC volunteers with a legitimate requirement (those involved in membership administration) will have access to your personal membership data, and only under strict controls and rules. We may also use limited identifiable information to support with the management and planning of PHCC, including accounting, auditing, training and development, as part of the legitimate interests of the Club.

Access to CCTV footage is limited to two Trustees and our system administrator. Information collected via CCTV is used for the prevention, detection and investigation of criminal activities, and may be shared with relevant law enforcement authorities as required and appropriate.

Access to DBS information is limited to the PHCC Welfare Officer and Deputy Welfare Officer, although details regarding safeguarding cases may be shared with British Canoeing, as the regulating body. It may also be necessary to share relevant information with other authorities, such as the Police, local Social Services and/or Childline.

We are required to share anonymised statistics about our members to British Canoeing on an annual basis. This is limited to anonymised age range and gender information about our membership. The only third party organisation with full access to all information concerning our members is WebCollect, and this is covered within their membership privacy notice: <https://webcollect.org.uk/help-topic/privacy-notice>. PHCC holds a contract with Open Brackets Limited to ensure compliance with relevant UK law.

Official photographs taken on behalf of PHCC are used for promotional purposes to raise awareness of the club, its activities and paddle sport in general, and also to encourage new and continued membership ([www.pooleharbourcanoecub.uk/page59.html](http://www.pooleharbourcanoecub.uk/page59.html)). To enable this, photographs may be uploaded to the following websites, which are publically available for anyone to view without an account/login:

- PHCC website - [www.pooleharbourcanoecub.uk/](http://www.pooleharbourcanoecub.uk/)
- PHCC Flickr page - [www.flickr.com/photos/pooleharbourcanoecub](http://www.flickr.com/photos/pooleharbourcanoecub)
- PHCC Flickr Facebook Page - [www.facebook.com/PHCC-on-FlickR-1504751983169199/](http://www.facebook.com/PHCC-on-FlickR-1504751983169199/)

Official photographs taken on behalf of PHCC and also photographs taken by PHCC members (for personal/domestic purposes) may also be uploaded to the:

- PHCC Facebook page (closed group): [www.facebook.com/groups/112865292144132/](http://www.facebook.com/groups/112865292144132/)
- PHCC Whats On? Page (public page): <https://www.facebook.com/phccwhatson/>
- PHCC photo competition Facebook page (public group): [www.facebook.com/groups/1083902641635184/](http://www.facebook.com/groups/1083902641635184/)

Unless there is a valid reason permitted by law, or there are exceptional circumstances (such as a likely risk to the safety of you or others), we will not disclose any information to any other third parties which can be used to identify you without your consent. We will never sell your information for any purpose, and will not provide third parties with your information for the purpose of marketing or sales.

### How long do we keep your information for?

To remain as an active member of PHCC, you are expected to renew your membership on an annual basis, which will include reviewing/updating your personal information and subscription information directly via WebCollect. Every June, the details of members without a valid subscription are removed from the PHCC database, although their details and membership may still be accessible via WebCollect: <https://webcollect.org.uk/help-topic/terms-amp-conditions>.

DBS information is retained for three years and one month by GBG Online Disclosures. After this time, all records will be automatically deleted by GBG Online Disclosures in line with their policy: <https://www.onlinedisclosures.co.uk/legal/privacy-policy/>. Incomplete or withdrawn applications will be automatically deleted by GBG Online Disclosures six months after the commencement date. PHCC do not retain DBS certificates. The limited DBS information retained by PHCC is only held for coaches and applicable helpers for the duration of the certification (three years) or their role with PHCC (whichever is shorter) and securely deleted upon expiry.

The normal retention period for CCTV footage is six months and this will only be extended where the footage forms (or has the potential to form) part of a criminal investigation. Data is automatically deleted on a rolling basis, unless required by the local law enforcement authorities.

If for any reason you no longer wish for PHCC to have access to your personal membership data, please contact us using the details provided below, and also refer to the WebCollect Terms and Conditions: <https://webcollect.org.uk/help-topic/terms-amp-conditions>.

Official photographs taken on behalf of PHCC are used as a historical record of club activities and therefore have an indefinite period of promotional value and will be retained for the duration of the club being active. If for any reason you no longer wish for your photograph to be used by PHCC, please contact us using the details provided overleaf.

### How can you get access to the information that we hold about you?

Under data protection legislation, you have the right to request access to the information that we hold about you. The primary source of this information is your WebCollect account, which you can access directly by logging into their website here: <https://webcollect.org.uk/>. If you would like to request access to any other information that we hold separately about you, please contact us using the details provided overleaf.

### How can you contact us with queries or concerns about your information or this privacy notice?

If you have any queries or concerns regarding the information that we hold about you or you have a question regarding this privacy notice, please contact the PHCC Chairman via post to Lake Pier, Lake Drive, Hamworthy, BH15 4LR, or by email to [enquiries@phcc.org.uk](mailto:enquiries@phcc.org.uk). You can also find details of our registration with the ICO online here: [www.ico.org.uk/esdwebpages/search](http://www.ico.org.uk/esdwebpages/search) (Registration No: ZA305551).

### How can you make a complaint?

You have the right to make a complaint if you feel unhappy about how we hold, use or share your information. Depending on the nature of your complaint, we would recommend that you contact us directly in the first instance (using the contact details provided above) to discuss your concerns.

If you remain dissatisfied following the outcome of your complaint, you may then wish to contact the Information Commissioner's Office via post to Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, online via <https://ico.org.uk/concerns/>, or on the phone by calling 0303 123 1113. Please note that the Information Commissioner will not normally consider an appeal until you have exhausted your rights of complaint to us directly. Please see the website above for further advice.