



Privacy Policy

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1 Overview

This policy explains when and why Row the Erne (hereafter referred to as RtE) collects personal information about individual members, skippers, and any other person in the normal course of administering membership, taster rows and running the club.

The Policy sets out how RtE uses and protects any information an individual gives it and an individual’s rights in relation to it.

RtE may collect, use, and store an individual’s personal data, as described in this Privacy Policy which guides all our GDPR decisions.



RtE complies with the **General Data Protection Regulation (GDPR) May 2018** when dealing with an individual’s personal data. Further details on GDPR can be found at the website for the Information Commissioner (www.ico.gov.uk).

For the purposes of the Privacy Policy, RtE will be the “controller” of all personal data it holds about the individual.

2 Definitions

Charity	Row the Erne, a registered charity NIC102251.
GDPR	General Data Protection Regulation.
Responsible Person	Mairead Larmer is responsible for data protection within the Charity.
Register of Systems	Register of all systems or contexts in which personal data is processed by the Row the Erne.

3 Principles of GDPR

All data processed by RtE follow the lawful GDPR principles as outlined below.

Refer to ICO guidance for more information: <https://ico.org.uk/for-organisations/data-protection-advice-for-small-organisations/>

Heading	Description
1. Lawfulness, Fairness and Transparency	All data processed by RtE will be done so lawfully, fairly and in a transparent manner in relation to individuals as outlined in this policy.
2. Purpose Limitation	All data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
3. Data Minimisation	<p>RtE will only process the personal data that the Club needs to achieve its processing purposes.</p> <p>The data that is collected is adequate, relevant and limited to what is necessary in relation to the purposes of running and administrating the Club.</p>
4. Accuracy	The accuracy of the data RtE stores is integral to Privacy Policy. RtE ensures all reasonable steps are taken to erase or rectify data that is inaccurate or incomplete.
5. Integrity and Confidentiality (Security)	RtE encrypts all personal data, wherever possible, and all data is processed in a manner that ensures appropriate security of the personal data.
6. Storage limitation	RtE deletes personal data when it is no longer necessary to their purpose, and when they have fulfilled their legal obligations regarding the amount of time data is stored.

4. Lawfulness, Fairness and Transparency

4.1 What kind of data RtE collects;

4.1.1 RtE collects the following from its members and their dependents:

- Member's full name, full address (inc. Postcode), telephone numbers;
- E-mail address(es);
- Names and ages of the Member's dependents;
- Date of Birth;
- Contact details for Family/Friend in case of emergency;
- Water readiness;
- Ability;
- Medical; and allergy details and
- Any other relevant information that the individual shares to ensure his/her wellbeing and that of the crew;

4.1.2. RtE will also require evidence that the individual has read;

- Safety policy;
- Volunteer Policy;
- Membership policy;
- Privacy Policy;
- Evidence that he/she has completed an induction and
- Covid Policy and has filled out an online Covid form.

4.2 Why does RtE collect the data?

4.2.1. RtE collects the data for the following reasons:

- Ensure all club activities are conducted safely and to protect the wellbeing of the individual and the crew;
- RtE collects and stores emergency contact details, enabling it to contact next of kin in the event of an emergency to protect the member's vital interests and those of their dependents.

4.2.2. RtE holds and shares with members the following details of the skipper:

- Name;
- Address;
- Email address;
- Phone numbers; and
- relevant qualifications and/or experience.

4.3 How RTE collects data

An Individual directly provides RtE with most of the data it collects. This happens when an individual:

- Registers online;
- Books a row (Member and taster sessions);
- Uses or views our website via your browser's cookies.

4.4 An Individual's rights under the GDPR

An Individual has the right to:

- Access personal data. They can do this by asking the Club's secretary or the GDPR officer;
- Request to correct personal data;
- Request to delete personal data in certain circumstances;
- Object to or restrict how personal data is processed; and
- Give consent to transfer personal data to individuals or to another party in certain circumstances.

4.5 Reporting and sharing data with third parties

RtE will not share an individual's details with any third parties unless with his/her permission.

5 Consent

RtE seeks an Individual's consent on their membership application form and each membership renewal form for the following:

- Uploading photos and videos onto the club's website and social media pages;
- Using photos and videos for press releases;
- Consent for creating and managing the club's online Membership Directory using all details outlined in 1.1 above.

RtE is committed to ensuring that an individual's information is correct and secure.

6 Purpose Limitation

RtE collects all data for specified, explicit and legitimate reasons. The data collected is listed above (4.1 What we collect). This data ensures that all club activities are conducted safely and protect the wellbeing of the individual and all the crew.

7 Data Minimisation

RtE ensures that all data collected is accurate, relevant and necessary for the safety of all members.

8 Accuracy

RtE will endeavor to ensure that all information gathered in relation to crew is accurate and complete.

Crew's data can be updated on request.

9 Security

RtE has in place suitable physical, electronic, and managerial procedures to safeguard and secure the information it collects online to prevent misuse, unauthorised access or disclosure.

RtE wishes to emphasize: When an individual is transmitting information to RtE over the internet this can never be guaranteed to be 100% secure.

RtE uses Stripe (Payment Gateway) for any payments it takes from individuals online. This is a recognised online secure payment system. Stripe provides all necessary security for all transactions on Row the Erne's website.

Incident and Injury forms will be stored in a locked filing cabinet in the home of a verified officer of the Club. The treasurer will store the locked filing cabinet in their premises from June 2021 until January 2023. Arrangements will be reviewed in January 2023.

9.2 Processing and Individual's data

GDPR states that personal data must be

"..processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

- RtE ensures that personal data is stored securely using Siteground. This is a password protected directory, is encrypted, and is backed up daily;
- Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information;
- When personal data is deleted, it is done safely, and the data is irrecoverable;
- RtE has appropriate back-up and disaster recovery solutions in place if the server goes down.

9.3 Breach of data

If there is a breach of data, RtE will report it to the appropriate authorities and it will let the relevant members know.

10 Retention

RtE holds an Individual's personal data on its systems for as long as the individual is a member of the club and for as long afterwards as is necessary to comply with our legal obligations. Unless otherwise stated, our legal requirements require us to store all information for three years following lapse of membership. The data of a minor will be stored until they are 18, plus three years. Session logs will be kept for three years.

Should a Governing Body require data to be retained for a longer amount of time, the policy will be updated accordingly.

RtE reviews an individual's personal data every year to establish whether it is still entitled to process it. If an individual's membership is not renewed, RtE will delete all his/her personal information three years of his/her membership finishing. Any data RtE deletes is irrecoverable.

11 Phishing

Phishing is the practice of tricking someone into giving confidential information. Examples include falsely claiming to be a legitimate company when sending an e-mail to a user, in an attempt to get the user to send private information that will be used for identity theft and fraud.

RtE will never ask an individual to send any personal details via email. If RtE requires such details, for security reasons, it will ask the individual to contact it in person or by phone. Should an individual receive an email claiming to be from rowtheerne.com requesting this kind of information, RtE asks the individual not to respond, but do let it know about it.

12 Cookies

A cookie is a small file which asks permission to be placed on an individual's computer's hard drive. Once an individual agrees, the file is added, and the cookie helps analyses web traffic or lets RtE know when you visit a particular site.

Cookies allow web applications to respond to the individual. The web application can tailor its operations to the individual's needs, likes and dislikes by gathering and remembering information about his/her preferences.

RtE uses traffic log cookies to identify what pages are being used. This helps it analyse data about web page traffic and improve its website to tailor it to customer needs. RtE only uses this information for statistical analysis purposes and the data is removed from the system.

Overall, cookies help RtE provide the user with a better website, enabling it to monitor what pages are useful. A cookie does not give RtE access to an individual's computer or any information about him/her, other than the data he/she chooses to share with RtE.

An individual chooses to accept or decline cookies. Most web browsers automatically accept cookies, but an individual can usually modify your browser setting to decline cookies if you prefer. However, this may prevent an individual from taking full advantage of the Club's website.

13 Links to other websites

The club's website may contain links to other websites of interest.

Once an individual clicks on a link to leave its site, RtE does not have any control over that other website.

Therefore, RtE is not responsible for the protection and privacy of any information which an individual provides whilst visiting linked websites. These websites are not governed by the Club's Privacy Policy. An Individual must exercise caution and look at the privacy statement applicable to the website in question.

14 Complaints

An individual has the right to take any complaint about how RtE processes his/her personal data to the Information Commissioner:

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

15 Register of Systems

RtE shall maintain a Register of Systems to ensure its processing of data is lawful, fair, and transparent:

- The Register of Systems shall be reviewed at least annually;
- An Individual has the right to ask RtE to access their personal data on their behalf. Any such requests made to RtE shall be dealt with in a timely manner.

16 Contact RtE

For general email correspondence and enquiries, contact RtE at:
secretary@rowtheerne.com

If an Individual believes that any information RtE is holding is incorrect or incomplete, please let RtE know or email it as soon as possible, at the email address above. RtE will promptly correct any information found to be incorrect.

For more details, questions, comments or requests regarding RtE's data processing practices, please contact the Club Secretary at the above email address.

A person may withdraw either consent at any time by contacting any member of the Committee or by emailing us at joinus@rowtheerne.com with **Unsubscribe** in the subject line.