

Data protection - Privacy Policy

Who are we?

We are the Jersey Canoe Club (the “JCC” or the “Club”) and our data protection representative can be contacted directly here:

Email: []

Our policy

The JCC is committed to complying with the Data Protection (Jersey) Law 2018 (“the Law”) and to respecting the privacy rights of individuals. This policy applies to all members of the club.

Our registration number under the Law is: 65245.

This Data Protection Policy (“Policy”) sets out our approach to complying with the Law and the principles that we will apply to our processing of personal data. The aim of this Policy is to ensure that we process personal data in accordance with the Law and with the utmost care and respect.

Personal information that we may collect from you

When you sign up for membership with us, you may provide us with or we may obtain personal information about you, such as information regarding your:

- personal contact details that allows us to contact you directly such as name, title, email addresses, home address and telephone numbers;
- date of birth;
- gender;
- membership details including start and end date;
- records of your interactions with us such as telephone conversations, WhatsApp messages, emails and other correspondence and your instructions to us;
- any credit/debit card and other payment details you provide so that we can receive payments from you and details of the financial transactions with you;

- records of your attendance and emergency contacts, at any activities, events and/or competitions hosted by us; or our affiliated clubs;
- any disciplinary and grievance information;
- images at events (e.g. Club events, AGM) and/or competitions in video and/or photographic form and voice recordings.

Purpose and legal basis

The table below describes below the main purpose for which we process your personal information and the legal basis for being able to do this.

Type of information	Purpose	Legal basis for processing
Member's name, address, telephone numbers, e-mail address(es), payment information	Managing the members membership of the Club.	Performing the Club's contract with the member. For the purposes of our legitimate interests in operating the Club.
Record of sessions/events attended	To comply with health and safety and club insurance requirements.	We have a legal requirement to provide you with a safe environment.
Age related information.	Managing membership categories which are age related for the purposes of competitions etc.	Performing the Club's contract with the member.
Gender	For club competitions	Performing the Club's contract with the member.
The members' kayak/SUP information	Ensuring that we offer the appropriate training and paddling sessions	For the purposes of our legitimate interests in operating the Club.

Photos and videos of members and their kayaks, SUP's and other club activities	Putting on the Club's website and social media pages and using in press releases, for the purpose of promoting the club and for the benefit of members	Any member may withdraw their consent at any time by contacting us by e-mail,WhatsApp, letter.
Emergency contact details.	Contacting the nominated person in the event of an emergency	Protecting the members' vital interests and those of their nominated person

Emergency contact details

The leader of any session will take a register and obtain an emergency contact number for all those taking part in the session including the leader, or leaders. That list and the name and phone number of the emergency contact number will be available to third parties, for example the emergency services, but only for the duration of the session. The provision of such contact details should be agreed in advance with the relevant individuals.

Consent

By consenting to this privacy policy you are giving us permission to process your personal data specifically for the purposes identified and for putting on the Club's website and social media pages any photos or videos and using them in any press release.

You may withdraw consent at any time by contacting the Club's Data Protection Representative.

Disclosure

We will never sell your personal data. We will not share your personal data with any third parties without your prior consent (which you are free to withhold) except where required to do so by law.

We may pass your personal data to third parties who are service providers, agents and subcontractors to us for the purposes of completing tasks and providing services to you on our behalf (e.g. to print newsletters and send you mailings). However, we

disclose only the personal data that is necessary for the third party to deliver the service and we have a contract in place that requires them to keep your information secure and not to use it for their own purposes.

The Club is an affiliate member of Paddle UK, we therefore have an obligation to comply with their rules and best practice requirements. This may include, for example, providing them with the details of any incidents and complaints against the Club or members.

We are also under a legal obligation to assist the police and law enforcement services, including the Coast Guard, with the provision of any information that they may request.

How we protect your data

The data that we collect from you may be transferred to, and stored at, a destination in the EEA. We will not transfer your personal data outside the EEA without your consent.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. We have implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

Please note however that where you are transmitting information to us over email or WhatsApp this can never be guaranteed to be 100% secure.

We will notify you promptly in the event of any breach of your personal data which might expose you to serious risk.

Retention period

We will hold your personal data on our systems for as long as you are a member of the Club and for as long afterwards as is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop

processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations e.g. compliance with tax requirements and exemptions, or defence of legal claims and related insurance purposes.

Where your membership lapses we will within a reasonable time of the lapse occurring cease actively processing and delete your data as a member but may retain your name and e-mail details for up to two years for the purpose of facilitating the renewal by you of your membership.

We securely destroy all financial information once we have used it and no longer need it.

Practical Considerations

The Club should always apply a common sense approach to how we use and safeguard personal data. Any personal data that is obtained should be treated with care and respect. Any such data should be kept in a safe and secure location and any data that is held electronically should be kept in a password protected file.

Website Cookies

Our website use cookies to distinguish you from other users of our website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive. They enable the JCC to provide features such as remembering aspects of your last session on the website. Cookies can be deleted from your hard drive if you wish. Most web browsers automatically accept cookies, but you can change your browser settings to prevent that. Even without a cookie you can use most of the features on the JCC web site. Our cookies do not contain any personally identifying information.

Under what circumstances will the JCC contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access: you have the right to request a copy of the information that we hold about you.
- Right of rectification: you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten: in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing: where certain conditions apply to have a right to restrict the processing.
- Right of portability: you have the right to have the data we hold about you transferred to another organisation.
- 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: in the event that the JCC refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined below.

All of the above requests will be forwarded on should there be a third party in the processing of your personal data.

Can I find out the personal data that the organisation holds about me?

JCC at your request, can confirm what information we hold about you and how it is processed. If the JCC does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection representative, where applicable.

- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of the JCC or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Complaints

In the event that you wish to make a complaint about how your personal data is being processed by the JCC (or third parties as described above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority, which is:

Jersey Office of the Information Commissioner, 2nd Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT