

### **Privacy Policy**

This Privacy Policy applies to all services, including online services, provided by Northwich Rowing Club Ltd (NRC), with company number, 11276639 and registered office at The Crescent, Northwich, Cheshire, CW9 8UN.

Please read this Policy carefully. You should only use this website and/or submit your personal information to us in any format if you agree with this Policy. This Policy may be updated from time to time, to reflect changes to our business, website or to data protection and privacy laws. It's advisable for you to revisit this privacy Policy regularly to ensure you understand its terms.

#### What we do

We are a membership-based organisation set up to promote the sport of competitive and social indoor and outdoor rowing, based on the River Weaver in Northwich.

# **Data protection compliance**

Unless stated otherwise, NRC is the data controller in respect of all personal data collected by NRC which means that we are responsible for ensuring that we do so in full compliance with data protection and all other related privacy laws.

This Privacy Policy explains what information is collected about you, how it is used, and the steps taken to ensure that it is kept secure. We also explain your rights and how to contact us.

#### Links to websites

Please note, this website may contain links to other websites (such as those of advertisers, our partners or governing bodies) that are not controlled by us, or our service providers. These links are provided for your convenience. We are only responsible for our own privacy practices and our security of NRC's website. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

### Children

If you are under 18, you will either need to ask your parent or guardian to register you for any NRC service.

We may require your parent or guardian to confirm that they have given permission. We may ask for their contact details so that we can check that they have done so and may carry out checks to confirm that the details you have given us are correct.

#### The information we collect and its sources

In order to provide the goods or services you request, we will obtain details including:

• contact details of those subscribing or registering for services, placing orders or making bookings and, where you do any of these things on behalf of another person we may require their contact details as well



- date of birth for example, where the service you require has age related restrictions or for verification purposes
- **supporting information** other information that is relevant to the goods or services you request such as photo ID information for accreditations, passport for foreign travel, clothing size for purchases of kit or other clothing items, dietary requirements where you are attending an event where refreshments are provided, allergy information or medical treatment that may need to be given to help those attending events.
- gender / disability / ethnicity information to enable us to ensure we meet our social inclusion and anti-discrimination responsibilities. We do not always ask for this and will only do so where we consider it relevant
- feedback and survey responses we receive from you and others

#### Where we obtain information

In most cases we will obtain information directly from you (or from someone who requests goods or services for you on your behalf) or the device you use to communicate with us. The information will be obtained through our website, telephone conversations, emails, texts, instant messages and written and verbal communications (including blogs and social media interactions), and from records of the goods and services provided to you via NRC representatives including, but not limited to, committee members and coaches; and approved third parties.

We may supplement the information that you provide with other information such as images of you that we obtain from our dealings with you (such as events you have attended, achievements in competitions) or which we receive from other organisations, such as other rowing organisations, sponsors or commercial partners.

## Information about other people

If you provide information to us about any person other than yourself, you must ensure that they understand how their information will be used and that you are authorised to disclose it to us, and to consent to its use on their behalf, before doing so.

#### IP addresses

We may collect your Internet Protocol addresses (also known as IP addresses) which is a unique address that PCs, tablets and smartphones use to identify themselves and in order to communicate with other devices in the network.

### **Cookies**

In common with many other website operators, we may use standard technology called 'cookies' on the NRC website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate our website on each visit.

Our cookies are used to enable us to develop our website and to enable you to properly navigate it. We use cookies to collect personal information to enable us to reflect our users interests and by noting who has seen which pages and advertisements (including 'click throughs' from emails and social media platforms), how frequently particular pages are visited and to enable us to determine the most popular areas of our websites. We may use cookies to enrich your experience of using our website by allowing us to tailor what you see to what we have learned about your preferences during your visits to our site. Sometimes we may use services of third parties and they may use cookies on our behalf in order to provide their services.

The cookies we use can be found here.

#### Preventing use of cookies

Most browsers automatically accept cookies, but you can usually change your browser to prevent cookies being stored. With experience, you can usually choose to switch off all cookies or to allow only certain 'trusted' sites to place cookies.

For further information on cookies and Flash cookies and how to switch them off see the Information Commissioner's website at www.ico.gov.uk or visit www.allaboutcookies.org or www.aboutcookies.org.

Please note, if you do turn cookies off, this will limit the service that we are able to provide to you and may affect your user experience

## Tracking technology

Occasionally, we may use digital tracking (usually in a cookie) on our website or in emails we send to you. We use these to ensure you receive appropriate information and do not receive multiple communications about the same thing (such as competition information) from different rowing related organisations.

### **Preventing use of tracking technologies**

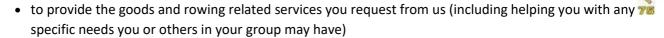
If you stop digital tracking cookies, this will normally stop any tracking from the website. Where we plan to use tracking technology, we will ask for your consent.

Please note, if you do not allow us to use tracking technology, you may receive communications that are of less interest to you or from all of those organisations that are involved in putting on an event.

### How we will use your information

All personal information that we obtain about you and/or any other person whose details you provide will be recorded, used, and protected by us in accordance with current data protection legislation, our and any other terms and conditions that are relevant to the goods or services you request and this Privacy Policy. We will primarily use the personal information for:

• for registration and general administration (including verification and security checking), creating and administering login credentials and access controls for online services



- to communicate with you in the event that any goods or services requested are unavailable or if there is a query or problem with the goods or services delivered
- to ensure a safe environment for the enjoyment of rowing events and activities
- for record keeping purposes
- for membership subscriptions
- to publish members' achievements and competition results on our website and in the local and national media
- to carry out market research so that we can improve the goods and services we offer
- for research purposes and to enable us to understand requirements and develop rowing related services
- to keep under review equal opportunities within cricket or ethnicity information to enable us to monitor and ensure compliance with anti-discrimination policies or to comply with our obligations to British Rowing, Sport England, Community Amateur Sports Club and World Anti-Doping Agency
- to track and analyse activity on our website and to understand the interests and views of our members
- to create an individual profile for you so that we can enhance your user experience, to understand and respect your preferences and to provide newsletters and details of relevant offers and opportunities where you have agreed to receive them

### Consent and lawful processing of personal data

The legal basis for the collection and processing of your personal data is:

- **for administration and service delivery:** that it is necessary to fulfil the membership contract that you are going to enter into or have entered into with us
- **for dealing with medical needs:** that you have given your explicit consent or, in serious cases that it is in your vital interests to help you
- for direct marketing: that you have given your consent
- for equality and inclusion: that you have given your explicit consent by answering the question
- in all other cases: that it is necessary for our legitimate interests which are to encourage participation in rowing and this does not prejudice or harm your rights and freedoms

#### Disclosing your personal information

In order to provide our products and services, we may, occasionally, appoint other organisations to carry out some of the processing activities on our behalf. These may include, for example, technology hosts, printing companies, mailing houses, kit providers and boat repairers. In these circumstances, we will ensure that personal information is properly protected and that it is only used in accordance with this Privacy Policy.

We may pass relevant personal information to race venues, other rowing clubs, British Rowing for rowing administration and research purposes where we believe this is appropriate to the service you require or to enable them to understand rower activity and to develop rower related services.

# Use of your personal information at events

In order to provide and administer events, we will provide relevant details to those running and specific sessions you attend. We will also use your information to ensure compliance with Health and Safety in order to ensure a safe environment for you and others to enjoy rowing. [Please see our Health and Safety Policy and Welfare Policy available on <a href="https://www.northwichrowingclub.com">www.northwichrowingclub.com</a> for further details]

### **Payment information**

The bank details you provide for the purposes of membership subscriptions will only be available to the NRC's Treasurer, Vice Treasurer and Membership Secretary and to HSBC Bank.

Card details for the goods and services provided by a third party provider will not be made available to NRC.

# **Rowing related organisations**

NRC has relationships with other rowing related organisations such as the national governing body for rowing, British Rowing, and Sport England, and CASC and some of the goods and services available on or through our website or Club are provided by those organisations. Each organisation has its own privacy practices and you should check that you are satisfied with them before you provide any personal information to them.

# NRC partner programme

NRC, rowing related organisations, sponsors and partners may like to contact you and/or any person whose information you provide to us to invite you to enjoy other products and services (where you have agreed), to provide newsletters and to tell you and/or them about offers and opportunities that are available and about a range of other initiatives in a number of ways, including by post, text message, email or, for relevant services, push notification, personalised on-screen messages and social media. Details of how to opt-in to or opt-out of receiving newsletters and details of offers are on relevant pages of the our website, in relevant forms you complete and/or in the electronic messages you receive.

# Preferences / Subscribe / Unsubscribe

You and any other person whose information you have provided to us can change your/their mind about whether you wish to receive details of offers and opportunities at any time by contacting us directly via our website, email or in writing, or by following the instructions with each offer you/they receive.

## Security

We take the security of personal information seriously and have procedures in place to ensure that our digital databases and paper systems are protected against unauthorised disclosure, use, loss and damage. We employ security technology such as double authentication and firewalls to safeguard your

personal information that we hold in digital format on our hard drives and where we hold your personal information in paper format, files are kept in a secure site under lock and key.

We only use third party service providers where we are satisfied that they provide adequate security for your personal data.

#### **Data retention**

We will normally keep your personal data for the period of time that you remain a member of NRC and require our goods and services. If, after this point, you have not taken up any further services, we will keep only minimal personal data about your membership to satisfy any statutory obligations.

# Use of your information outside of Europe

Unless we say otherwise in the privacy notice you are given, we do not transfer personal data outside of the United Kingdom or the European Economic Area.

If you provide any information to us in relation to competitions held outside the EEA, we will, of course, ensure that your information is transferred securely and in accordance with Privacy Policy and applicable privacy laws.

## Changes to this privacy policy

Privacy laws and practice are constantly developing and we aim to meet high standards. Our policies and procedures are, therefore, under continual review. We may, from time to time, update our security and privacy policies. If we want to make any significant changes in how we will use your personal data we will contact you directly and, if required, seek your consent.

We will ensure our website has our most up to date policy and suggest that you visit our privacy pages periodically to review our latest version.

## **Updating and correcting information**

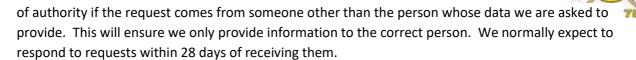
You may update or correct your personal information online in relevant membership areas or by contacting us via our website, email or in writing. Please include your name, address and/or email address when you contact us as this helps us to ensure that we accept amendments only from the correct person. We encourage you to promptly update your personal information if it changes.

If you are providing updates or corrections about another person, we may require you to provide us with proof that you are authorised to provide that information to us.

# Your rights

You have a number of legal rights in respect of your personal data. These include:

• The right to receive a copy of the personal data that we hold about you. The same right applies to any other person whose personal data you provide to us. We will require proof of identity and proof



- withdraw consent to direct marketing. You can exercise this right at any time and can update your preferences yourself or ask us to do it for you. See section 'Updating and correcting your personal data' above for details.
- withdraw consent to other processing. Where the only legal basis for our processing your personal data is that we have your consent to do so, you may withdraw your consent to that processing at any time and we will have to stop processing your personal data. Please note, this will only affect a new activity and does not mean that processing carried out before you withdrew your consent is unlawful.
- If you consider any of your personal data is inaccurate, you can ask us to correct it (see 'Updating and correcting your personal data' above for details).
- In limited circumstances you may be able to require us to restrict our processing of your personal data. For example, if you consider what we hold is inaccurate and we disagree, the processing may be restricted until the accuracy has been verified
- In some circumstances, for example, where we have no legal basis for retaining your personal data, you may be entitled to require us to delete your personal data
- Where our processing is based on it being in our legitimate interests, your rights and freedoms, based on your particular situation, may enable you to object to our processing
- Where you have provided personal data to us electronically, you may be entitled to require us to provide that data to you electronically or to transmit it to another organisation.

# How to contact us

Captain: <u>captain@northwichrowing.co.uk</u>

Membership Secretary: <u>membershipsecretary@northwichrowing.co.uk</u>

Junior Co-ordinator: <u>jcnorthwich@gmail.com</u>