

DCKC Data Protection Policy

Background:

GDPR came into force on 25 May 2018 and the club's data protection policy has been updated to take account of that legislation. GDPR relates to personal data, which is any data sufficient to identify an individual. It applies a much stricter standard on data protection and also on the standards for obtaining permission to store and use data. Permission will need to be explicit and granular (i.e. split up to each specific thing). Individuals will also be able to ask what data about them is being kept and by whom and the club will have 14 days to reply. There will be a legal requirement to report any data breach to the ICO and to the individuals concerned within 72 hours. GDPR will affect small businesses and voluntary clubs, as well as larger businesses.

Under GDPR, DCKC documents when we are given permission to store the data, where the data is being kept, and what steps we put in place to protect it.

What data does DCKC have?

- We have data on our members, namely: names, addresses, sex, phone numbers, email addresses, SCA membership nos., dob, and medical information of members. From 2018-2019 we will no longer ask for any medical information on the membership form, but will ask members to advise the coaches / trip organisers of any medical issues which may affect their paddling.
- For those members who have requested a "log in" for the club website so that they can post content, e.g. trip reports, on the website, their names are also stored on the website CRM as part of the log in facility.
- We hold names and phone numbers of next of kin.
- Members can opt in to receive the club newsletter and other email notifications from DCKC.
- Members can also opt in to receive information from SCA.
- Members can opt into informal WhatsApp groups which give information on trips for i) sea kayakers and ii) rivers kayakers.
- We keep qualification and disclosure information on all of our coaches.

Other WhatsApp groups may be formulated informally between members (e.g. the 4-star sea kayak group) but these are not "run" by the club centrally.

However, the club would encourage any administrator to ensure that everyone in the group is happy to be added.

How do we collect this data?

We collect this data via the annual membership form, which also sets out the main principles of this Privacy Policy.

Whilst we encourage all members to complete a membership form each year, sometimes a member doesn't complete the form, but just pays the annual membership fee. In this circumstance, we will take the payment of the fee to be permission to keep the data provided the previous year on our database for the relevant year of membership.

Members who have not renewed their membership within the 3 months following the renewal date will be deleted from the membership list, including

the email list (if they have subscribed) and the website (if they have asked for a log in).

Why do we keep this data?

As a club, we have a legitimate reason to hold contact details for our members so that we can contact them to remind them of membership renewal.

We have a legitimate interest in holding next of kin information in case of any incidents.

The opt in for the newsletter and other contacts allows us to promote the club's activities to the membership.

Addition of a member's name onto the website in order to provide a log-in is only done at their explicit request.

Additionally, we obtain insurance via SCA as an affiliated club. The SCA asks us to provide name, email addresses, SCA membership nos., sex and date of birth. We ask for the sex and date of birth of our members only because the SCA require this information. We ask for SCA membership details this this allows us to pay a reduced fee to the SCA for that member.

We keep the additional data on our coaches in order to confirm that all qualifications, training and checks are up to date.

Where do we keep the data?

The membership database is kept electronically on a memory stick at the home of the membership secretary. The database is password protected. Old copies of the membership database are also on the memory stick.

The paper copies of membership forms are kept securely at the home of the membership secretary.

Where membership forms have been provided electronically, these are stored on the password protected memory stick.

We use Mail Chimp as a data processor for the newsletter. Mail Chimp is GDPR compliant. It provides an automatic opt out for emails so members can unsubscribe at any point. Mail Chimp allows emails to be sent whilst keeping the data (names, addresses, emails) only viewable by the administrator (the membership secretary).

The SCA is also a data processor, for insurance purposes. The SCA requires us to provide names, address, d.o.b., sex, SCA number, and email addresses of members. Members can opt out of receiving emails from SCA. To allow liaison with the SCA members' data will be shared with committee members on a "need-to know" basis, i.e. only the data needed for the particular task will be shared.

We also store some very limited data on our website (members' names) to allow log in for those members who have requested this.

The treasurer has a list of member names and the membership fees paid.

Data Retention

Our data retention policy is:

- We will retain membership data for the membership year and for 6 years after expiry of the membership year. This is in line with the SCA retention policy for the same data.
- We will retain correspondence regarding any complaint or grievance for 5 years, in line with the SCA retention policy for the same data.
- We will retain minutes of committee meeting indefinitely.
- If there has been an incident involving any one under 18 years old, records concerning the incident and will be retained a period equated to 3 years after the individual becomes 18 years old (i.e. under expiry of the deadline for an insurance claim to be made under the Limitation Act 1980).

Documents and data will be destroyed (paper copies will be shredded) on an annual basis.

Other Data Issues

This policy will be reviewed annually by the committee (or more frequently as required).

For further information on how DCKC maintain personal data, or for subject access requests or your right to be forgotten, please write to the Membership Secretary, by using the “contact the membership secretary” link on the DCKC website.

For further information on how your information is used by the SCA or the SCA's Privacy Policy, or for subject access requests or your right to be forgotten to the SCA, please write to The Data Controller, Scottish Canoe Association, Caledonia House, South Gyle, Edinburgh, EH12 9DQ or email: sca.dpo@canoescotland.org or by phoning the SCA office during office hours.

Any complaint arising from DCKC's handling of personal information should be raised with the Club Chairperson as a grievance which may then be dealt with under the discipline procedure as outlined in Drumchapel and Clydebank Club Rules and Guidelines.

We welcome any feedback on how to improve our data protection, as we are committed to ensuring that the committee and club treat our members' data with appropriate respect.