Ipswich Canoe Club
Privacy Policy

Policy Version: 1
Effective Date: 20/4/2025
Review Frequency: Annually

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1. Introduction

Ipswich Canoe Club ("the Club", "we", "us") is committed to protecting and respecting your privacy. This policy explains how we collect, use, store, and protect personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The Club is affiliated with Paddle UK and follows Paddle UK's governance, safeguarding and event standards where applicable. Ipswich Canoe Club and Paddle UK are separate organisations and act as independent data controllers for the personal data each of them processes.

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2. Data Controller

Ipswich Canoe Club is the Data Controller for personal data processed for club purposes.

Contact for data protection matters:
Club Secretary
Ipswich Canoe Club
Email: secretary@ipswichcanoeclub.org.uk

The Club is subject to UK data protection law and the oversight of the Information Commissioner's Office (ICO).

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3. What Personal Data We Collect

We may collect and process the following information:

- **Membership Information**
  - Full name
  - Date of birth
  - Address
  - Email address
  - Phone number
  - Emergency contact details
  - Relevant medical information (where voluntarily provided)
  - Paddle UK membership number (where applicable)
  - Coaching and leading qualifications and roles (if applicable)
  - How you learnt about the club and your aspirations
  - Your paddling experience

- **Event & Activity Information**
    - Event, trip and session attendance records
    - incident/accident reports
    - Participation in taster sessions or guest activities
    - Driving licence and vehicle insurance details when towing club trailers.
    - Aspirations and feedback
- **Communications Data**
    - Messages and participation within:
      • Spond
      • WhatsApp
      • Facebook
      • Club email distribution lists
      • Records of key correspondence with the Club (e.g. complaints, safeguarding concerns)

- **Website / Online Contact**
    - Information submitted via any online contact or booking forms on the Club's website, such as your name, contact details and enquiry.

We may collect information about children and young people where they are members or participants. In such cases, we will also hold contact details for a parent or guardian.

3a. How We Collect Your Data

We normally collect necessary personal data directly from you (or, for juniors, from a parent or guardian), for example when you:

• Apply for or renew membership
• Register for a session, trip, event or taster activity
• Complete a consent, medical or photography form
• Contact us by email, messaging app or online form

We may also receive information:

• From Paddle UK, for example to verify PaddleUK membership status, Qualification & Credentials or information in relation to incidents or safeguarding
• From others (such as witnesses, other clubs, or statutory agencies) where necessary for safeguarding, incident reporting, insurance or legal purposes.

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4. How We Use Your Data

We use personal data to:

• Manage club membership and renewals
• Organise and administer paddling sessions, trips, training and events (including for non-member guests and taster participants) and to keep paddlers safe on trips and courses.
• To help coaches and leaders understand if certain trips are suitable for you and to support you on your paddling journey
• Confirm your membership and insurance status
• Communicate safety information, last minute changes and cancellations
• Manage qualifications, coaching and leadership records
• Process club affiliation and relevant registrations with Paddle UK
• Respond to, record and follow up incidents, accidents and safeguarding concerns
• Meet insurance, safeguarding and legal obligations
• Maintain basic financial and administrative records
• Promote the Club (for example, via photographs, where consent has been given)

We do not sell or share personal data for marketing purposes.

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5. Lawful Basis for Processing

We process personal data under the following lawful basis:

Contract – to administer membership and participation, including:
• Setting up and managing your membership
• Managing your booking or place at a session, trip, event or taster activity
• Communicating with you about sessions, trips and events you sign up to

Legal obligation – to meet legal requirements, including:
• Safeguarding, health and safety and insurance reporting
• Keeping certain records for tax, accounting or regulatory purposes

Legitimate interests – to run and develop the Club effectively and safely, for example:
• Communicating routine club information to you
• Maintaining attendance, incident and qualification records
• Managing waiting lists or allocating spaces fairly for trips and events
• Ensuring appropriate supervision and safety during activities

We consider our legitimate interests carefully and balance them against your rights and freedoms.

Consent – where we rely on your clear agreement, for example:
• Collecting and using medical information you choose to provide to keep you safe and support you in an emergency
• Using photographs or video of you for publicity or social media in accordance with your preferences.
• Adding you to optional messaging platforms such as WhatsApp groups

Where we rely on consent, you may withdraw it at any time. This will not affect the lawfulness of processing before consent was withdrawn, but we will stop using your data for that purpose going forwards.

For some standalone events or taster sessions, particularly with non-members, we may rely on consent as the lawful basis for processing, in line with Paddle UK's Standards for Events

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6. Special Category Data (Medical Information)

Medical information is classed as “special category” data under UK GDPR. You do not have to give us medical details, but if you choose to, we will only use it to:

• Help keep you safe during club activities
• Inform decisions in an emergency or when making reasonable adjustments

We process this information under:

• Your explicit consent, and
• Where relevant, the vital interests of you or another person, and/or the “not for profit body” provisions in the Data Protection Act 2018.

Access to medical information is strictly limited to those who need it (for example, relevant coaches, trip leaders or first aiders, also relevant health professionals in an emergency)

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7. Use of Third Party Platforms & International Transfers

The Club uses the following third party services:

Spond
Used for:
• Event and session scheduling
• Official Club Communication
• AGM and meeting notices
• Policy updates and Club information
• Safety notifications
• Attendance tracking
• Event and trip updates
• Member and official communication
• Sharing key club information

Members (or parents/guardians) create their own accounts and agree to Spond’s terms and privacy policy separately. For the information you supply directly to Spond, Spond acts as an independent data controller and will process your data in line with its own privacy policy.

WhatsApp
Used for:
• Informal group communication
• Possible Event and trip updates
• Possible Safety notifications

Joining WhatsApp groups is voluntary. If you join your phone number will be visible to other group members. Participation in WhatsApp is not a condition of membership. WhatsApp acts as an independent data controller for the information you provide directly to it.

We do not normally use WhatsApp or similar platforms to discuss detailed safeguarding concerns or other highly sensitive information; these should be raised through official club contacts using more secure channels.

Email
Used for Official club communication such as:
• AGM and meeting notices
• Policy updates and club information
• Sharing key club information
• Event and trip updates
• Safety notifications
• Event and session scheduling

Distribution lists are managed so that addresses are not shared publicly.

Facebook
Used for:
• Informal group communication

Joining the internal club Facebook group is voluntary. If you join your participation will be visible to others. Participation in Facebook is not a condition of membership. Facebook acts as an independent data controller for the information you provide directly to it.

We do not use Facebook to discuss detailed safeguarding concerns or other highly sensitive information; these should be raised through official club contacts using more secure channels.

International transfers
Some third party providers (such as Spond, WhatsApp and Facebook) may process data on servers outside the UK. We only use reputable providers and rely on the safeguards described in their privacy policies (such as standard contractual clauses or other recognised protections).

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8. Data Sharing

We may share your data with:

• Paddle UK – for affiliation, membership verification, insurance, incident reporting, safeguarding or event purposes. Ipswich Canoe Club and Paddle UK act as independent data controllers. Paddle UK will process your data in line with its own privacy notices, available via the Paddle UK Privacy Policy Centre: https://paddleuk.org.uk/privacy-centre/.
• Insurers and legal advisers – if required following an incident, claim or complaint
• Emergency services or medical professionals – where necessary to protect your vital interests
• Venue or facility providers – only where needed for access or safety (e.g. attendance lists for pool sessions) and based on our legitimate interests in running safe activities.

Where there is a safeguarding concern, we may share relevant information with Paddle UK's safeguarding team or other appropriate agencies, in line with Paddle UK safeguarding policies and statutory guidance.

We do not share personal data with third parties for commercial marketing.

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9. Data Storage, Security & Retention

We take appropriate technical and organisational measures to keep your data secure:

• Electronic data is stored in password protected systems or devices.
• Access is limited to committee members, coaches or leaders who need it for their role.
• Any paper records are stored securely and disposed of safely when no longer required.

We will not keep your personal data longer than necessary for the purposes described in this policy. Typical retention periods are:

• Membership records: Normally up to 6 years after your membership ends, unless a longer period is required for legal, safeguarding or insurance reasons.
• Event/session attendance records: Normally 6 years after the event or activity.
• Incident and accident reports: Normally a minimum of 6 years after the incident, or longer where a legal claim, complaint or safeguarding issue may reasonably arise.
• Safeguarding records: Retained in line with Paddle UK safeguarding guidance and relevant statutory guidance. This may require long term retention, especially where concerns involve children or adults at risk.
• Financial records (where they contain personal data): Usually 6 years, to comply with tax and accounting requirements.

Where records relate to children or young people, retention periods may extend for three years beyond them reaching 18, in line with legal and safeguarding guidance.

Committee members, coaches, leaders and volunteers who handle personal data as part of their club role will receive basic guidance or training on data protection appropriate to their role. They are required to familiarise themselves with this Privacy Policy, follow it in their work for the Club, and keep any personal data they access confidential and secure.

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10. Photography & Media

Photographs or videos may be taken at club sessions, trips or events for promotional or record keeping purposes (for example, on the Club's website, social media or printed materials).

• We will obtain your consent before publishing identifiable images of you.
• Parents or guardians must provide consent for juniors (under 18s).
• You can withdraw your consent at any time. We will then stop using your image in new material. We may not always be able to remove images already widely shared, but we will take reasonable steps to stop further use by the Club.

Participation in club activities is not conditional on agreeing to be photographed for publicity.

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11. Children and Young People

The Club is committed to safeguarding children, young people and adults at risk.

• Where we process personal data about children, we will obtain consent from a parent or guardian where required.
• We apply a higher duty of care to children's personal data and limit access to those who need it for safeguarding, coaching or administration.
• Our safeguarding procedures align with Paddle UK policies and guidance.

For any safeguarding concern, please contact our Welfare Officer at childprotection@ipswichcanoeclub.org.uk or follow Paddle UK's guidance at: https://paddleuk.org.uk/report-a-safeguarding-concern/

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12. Your Rights Under UK GDPR

You have the following rights in relation to your personal data:

• Right of access – to request a copy of the personal data we hold about you.
• Right to rectification – to request correction of inaccurate or incomplete data.
• Right to erasure – to request deletion of your data where there is no compelling reason for its continued processing (this may be restricted where we must keep data for legal or safeguarding reasons).
• Right to restrict processing – to ask us to limit how we use your data in certain circumstances.
• Right to object – to object to processing based on our legitimate interests.
• Right to withdraw consent – where we rely on consent (e.g. photography, optional messaging groups, medical data), you may withdraw it at any time.

To exercise any of these rights, please contact the Club Secretary at secretary@ipswichcanoeclub.org.uk

We would appreciate the opportunity to address any concerns directly. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):
Website: https://ico.org.uk

Automated decision-making
The Club does not make decisions about you based solely on automated processing (with no human involvement) that have legal or similarly significant effects.

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13. Data Breaches

Any suspected or actual personal data breach must be reported immediately to the Club Secretary.

• We will investigate and, where required, report the breach to the ICO within 72 hours.
• We will keep a record of all data breaches.
• Where a breach is likely to result in a high risk to your rights and freedoms, we will also inform you without undue delay.

14. Policy Review

This policy will be reviewed at least annually by the Club Committee and updated as necessary, for example to reflect changes in legislation or in how the Club operates.

The latest version will be made available to members (e.g. via the Club website, Spond, or on request).

Document ends