

## **Star Diving Club Data Protection Policy**

This policy explains how Star Diving Club Guildford (“the club”) will use or process personal data about individual members of the club, including current divers, past and prospective, their parents, carers or guardians and host families (referred to as “parents”).

### **Responsibility for Data Protection**

The committee of the club is responsible for ensuring that the club complies with Data Protection Law. Annika Llewellyn-Smith is responsible for ensuring that the club complies with all policies and procedures in relation to Data Protection. She can be contacted on [annika@stardiving.org](mailto:annika@stardiving.org)

### **Purposes for which the club process personal data**

The club collects, creates and holds personal information relating to members of the club, and their parents. The club uses this information to:

- Provide diving lessons and coaching sessions and opportunities to compete in the sport of diving.
- To safeguard members’ welfare and provide where necessary medical care.
- To enable members to compete in competitions, locally, nationally and if relevant internationally, and to publish the results of such competitions.
- To arrange travel and accommodation for relevant competitions and training.
- To maintain relationships and offer diving opportunities with other diving clubs for the members’ benefit.
- To make use of photographic images of members in club publications and other marketing material, on the club website, in a club newsletter, on Facebook, Twitter and other social media platforms in accordance with the club’s image consent form and policy.
- To raise invoices and process payments in accordance with the club’s terms and conditions.
- For security purposes, regulatory and legal purposes (for example, child protection and health and safety) and to comply with the club’s legal and constitutional obligations.
- Where otherwise reasonably necessary for the club to carry out its purpose of providing diving lessons and insurance for the club.
- To keep parents and carers updated about the activities of the club by email.

### **Categories of personal data that we process**

The personal data processed by the club will include:

- Names, addresses, telephone numbers, email addresses and other contact details.
- Fee payer’s bank details.

- Passport and visa details (where applicable for international competitions).
- Personal characteristics such as ethnic group, and any relevant medical information.

### **Legal basis for the processing of member and parent data**

The legal basis for processing the personal data listed above is:

- To enable the club to provide the services set out in our contract with you.
- To comply with our legal obligations.
- Where the processing is necessary for the purposes of the club's legitimate interests.

Information relating to racial or ethnic origin, religious beliefs or health will only be processed with the explicit signed authorisation of the member or member's parents.

### **Date Retention periods**

Membership information will be preserved for 1 year after the member ceases to be a member of the club. Information relating to financial transactions will be kept for 7 years.

The club has technical and organisational measures to ensure a level of security appropriate to the sensitive nature of the personal data that we process. Our security of personal data policy is available on request.

### **Data processors**

The club uses Microsoft Office 365 to provide us with a management information system, accounts software, cloud storage services. This use of data processors will only take place if it is in compliance with the data Protections Act 1998 and the General Data Protection Regulation.

### **Rights of the Data Subject**

You have the right to access the personal data that the club hold about you. Requests need to be made in writing and if the member is over the age of 12 they will also need to sign the request.

You may withdraw your consent to the club processing your data at any time. You also have the right to have personal data rectified if it is inaccurate or incomplete.

**(Last updated Sep 2020)**